Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/21/2011

Certified Mail

Facility ID: 0546000117
Permit Number: P0104750
County: Logan

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

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 9/8/2010. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Southwest District Office

Response to Comments

Facility ID:	0546000117
Facility Name:	HONDA OF AMERICA, EAST LIBERTY PLANT
Facility Description:	Auto Assembly Plant
Facility Address:	11000 St. Rt. 347 East Liberty, OH 43319-9407 Logan County
Permit:	P0104750, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Bellefontaine Examiner on 09/10/2010. The comment period ended on 10/10/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

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: Honda of America

a. Comment: I was unable to find any requirements related to CAM or the CAM plan we submitted with the TV renewal application. In the CAM plan we submitted, we addressed emission units K001, K002, K003, K005, K006 and K024.

b. Response: Cam was added.

2. Topic: Honda of America

a. Comment: OAC 3745-17-11(C) does not apply to K002 and K024 since these sources meet the exemption in 3745-17-11(A)(1)(j) which states: "This rule applies to any operation except...Surface coating processes (eg., for sealers, adhesives, and deadeners) that employ airless spray and bead type (extrusion) application methods." OAC 3745-17-11(C) does not apply to K013 since this source meets exemption 3745-17-11(A)(1)(h) and (j). The exemption in (h) specifies that "this rule applies to any operation except...Surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings.

b. Response: ST&C's modified.

3. Topic: Honda of America

a. Comment: OAC 3745-17-11(C)(1) and (2) do not apply to the following sources: K003, K005, K006, K007, K008, K009, K011, K012, K015 since all of these sources have BAT limits for PE that were established prior to 2006. As well, these sources meet the exemption detailed in 3745-17-11(C)(3) "Any surface coating process with a permit-to-install issued after Jan1, 1990 that identifies particulate emission limitations and control measures based on best available technology...shall comply with such limitations and measures instead of paragraph (C)(1) and (C)(2) of this rule

b. Response: ST&C's modified.

4. Topic: Honda of America

a. Comment: PTI's for sources K002 and K024 were administratively modified to state that the incinerator must be operating when the oven associated with the emission unit is processing units. This change was not incorporated into the sources in the TV. I have marked the changes in the attached permit.

b. Response: ST&C's modified.

5. Topic: Honda of America

a. K015 - Since this source is subject to the Plastic Parts Coating MACT the Air toxics language is no longer applicable. Please remove.

b. Response: ST&C's modified.

6. Topic: Honda of America

a. P025 - P027: The Air toxics language pasted into the permit is the language from K015 source instead of the injection molding sources. The current language identifies the pollutant and modeling information incorrectly - the pollutant is isopropanol rather than Cyclohexanone

b. Response: ST&C's modified

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
HONDA OF AMERICA, EAST LIBERTY PLANT

Facility ID:	0546000117
Permit Number:	P0104750
Permit Type:	Renewal
Issued:	9/21/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
HONDA OF AMERICA, EAST LIBERTY PLANT

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Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0037077
Permit Number: P0104750
Permit Description: Title V renewal for Honda's East Liberty, Ohio, Auto Assembly Plant. With a number of coating operations, w/ Compliance Assurance Monitoring (CAM) located in Logan County, Ohio.
Permit Type: Renewal
Issue Date: 9/21/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0088810

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Southwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(2) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(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 paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(3) 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:

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)Records Retention Requirements Under State Law Only

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.

25. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

26. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

27. 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.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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) B.2.f).

1. The following are facility-wide terms and conditions:

a) The Ohio EPA has approved the compliance assurance monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units K001 thru K006, and K024. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64).

b) The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following:

(1) 1500 million cubic feet of natural gas, as a rolling, 12-month summation;

(2) 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and

(3) 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.

(4) The permittee shall maintain monthly records of the following information for the facility:

a. the natural gas usage, in million cubic feet;

b. the No. 2 fuel oil usage, in gallons;

c. the percent sulfur content, by weight, for the No. 2 fuel oil employed;

d. the rolling, 12-month summation of the monthly natural gas usage rates; and

e. the rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.

(5) For each shipment of oil received for burning, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content. A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

(6) The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, or equivalent methods as approved by the Director.

(7) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage limitation of 1500 million cubic feet, the rolling, 12-month No. 2 fuel oil usage limitation of 1.0 million gallons, and/or the No. 2 fuel oil sulfur content limitation of 0.5%, by weight.

These reports shall be due by the date described in this permit.

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

a. Sulfur Content Limitation:

i. 0.5%, by weight sulfur content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in this permit.

b. Operational Restrictions:

i. 1500 million cubic feet of natural gas/rolling, 12-month summation; and

ii. 1.0 million gallons of no. 2 fuel oil/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in this permit.

c) Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21. The following emissions units are defined as insignificant emission units at this facility and meet the requirements of either an exemption under OAC rule 3745-31-03 or have a uncontrolled potential of less than 5 tons per year as defined under OAC rule 3745-77-01(U):

(1) B007 - air handler No. 25 (PTI 05-10022, issued 5/19/99);

(2) B036 - air handler No. 24 (exempt per OAC rule 3745-31-03);

(3) B037 - air handler No. 26 (exempt per OAC rule 3745-31-03);

(4) B038 - air handler No. 27 (exempt per OAC rule 3745-31-03);

(5) B043 - fire pump No. 1 (exempt per OAC rule 3745-31-03);

(6) B044 - fire pump No. 2 (exempt per OAC rule 3745-31-03);

(7) B045 - emergency generator No. 1 (exempt per OAC rule 3745-31-03);

(8) G001 - AF gasoline/diesel dispensing (exempt per OAC rule 3745-31-03);

(9) G002 - AQ gasoline dispensing (exempt per OAC rule 3745-31-03);

(10) G003 - ELP gas plaza (exempt per OAC rule 3745-31-03).

(11) K018 - WE rust prevention (PTI 05-7914, issued on 7/24/96);

(12) L002 - cold cleaner - ST Cold Cleaner (exempt per OAC rule 3745-31-03);

(13) L003 - MOS cold cleaner (exempt per OAC rule 3745-31-03);

(14) L004 - PA cold cleaner - clearcoat B booth/interior check (exempt per OAC rule 3745-31-03);

(15) L005 - PA cold cleaner - basecoat B booth/operating area (exempt per OAC rule 3745-31-03);

(16) L006 - PA cold cleaner - basecoat A booth/operating area (exempt per OAC rule 3745-31-03);

(17) L007 - PA cold cleaner - clearcoat A booth/interior check (exempt per OAC rule 3745-31-03);

(18) L008 - PA cold cleaner - primer booth/interior check (exempt per OAC rule 3745-31-03);

(19) L009 - PA cold cleaner – OTP maintenance cage (exempt per OAC rule 3745-31-03);

(20) L010 - PA cold cleaner – OTP maintenance cage (exempt per OAC rule 3745-31-03);

(21) L011 - PA cold cleaner – OTP maintenance cage (exempt per OAC rule 3745-31-03);

(22) L012 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);

(23) L013 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);

(24) L014- PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);

(25) L015 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);

(26) L016 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);

(27) L017 - cold cleaner - AF maintenance cage (exempt per OAC rule 3745-31-03);

(28) L018 - cold cleaner 1 - maintenance cage (exempt per OAC rule 3745-31-03);

(29) L019 - cold cleaner 2 - maintenance cage (exempt per OAC rule 3745-31-03);

(30) L020 - cold cleaner 3 - maintenance cage (exempt per OAC rule 3745-31-03);

(31) L021 - cold cleaner - paint OTP maintenance cage (exempt per OAC rule 3745-31-03);

(32) L022 - cold cleaner - Surfacer Sanding (exempt per OAC rule 3745-31-03);

(33) L023 - MS parts washer (exempt per OAC rule 3745-31-03);

(34) P001 - pretreatment/phosphate process (PTI 05-7923, modification issued 1/08/08);

(35) P002 - body line paint effluent system (PTI 05-7923, modification issued 1/08/08);

(36) P003 - EDP sanding (PTI 05-7923, modification issued 1/08/08) **;**

(37) P006 - process welding and related operations (PTI 05-7923, modification issued 1/08/08);

(38) P014 - on-line repair sanding (PTI 05-7923, modification issued 1/08/08);

(39) P015 - final inspection dynamometer (exempt per OAC rule 3745-31-03(A)(1)(rr);

(40) P016 - topcoat inspection sanding (PTI 05-7923, modification issued 1/08/08);

(41) P017 - inspection sanding (PTI 05-7923, modification issued 1/08/08);

(42) P018 - WE sealer wipe (PTI 05-06431,issued 8/28/01);

(43) P020 - BPA polish (PTI 05-10278, modification issued on 11/01/07);

(44) P023 - stamping transfer press (PTI 05-9074, issued 6/3/99);

(45) P044 - Wheelabrator (exempt per OAC rule 3745-31-03);

(46) T001 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

(47) T002 - volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

(48) T005 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);

(49) T006 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

(50) T007 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);

(51) T008 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);

(52) T009 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

(53) T010 – Virgin solvent storage tank (exempt per OAC rule 3745-31-03);

(54) T013 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);

(55) T019 - Bonderite storage tank (exempt per OAC rule 3745-31-03);

(56) T020 - muriatic acid storage tank (exempt per OAC rule 3745-31-03);

(57) T024 - PA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03).

(58) T025 – BPA Virgin Purge Solvent Above Ground Storage Tank (6,000 Gal) and Loading Rack (exempt per OAC rule 3745-31-03; and

(59) T026 -BPA Spent Purge Solvent Above Ground Storage Tank (6,000 Gal) and Loading Rack (exempt per OAC rule 3745-31-03).

d) For the purposes of this permit, references to particulate emissions (PE) refers to the definition in OAC rule 3745-17-01(B)(11). Per OAC rule 3745-17-11, PE is defined as, "particulate matter measurable by the applicable test methods in 'Appendix A' of 40 CFR Part 60 'Standards of Performance for New Stationary Sources,' as such appendix existed on July 1, 1996."

e) The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached):

(1) K015; P020 and P021.

f) The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart IIII-- Automobile and Light-Duty Truck Surface Coating:

(1) K001; K002; K003; K005; K006; K007; K008; K009; K011; K012; K013; K024, and P006.

g) The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

(1) K025 - BPA paint mini-spray booth;

(2) K026 - PA New Model Development, On-line Repair and Testing Painting Activities;

(3) P031 - water plant lime silo;

(4) K028 - paint test lab;

(5) P019 – Plastic Pretreatment System;

(6) P030 - wastewater treatment plant;

(7) K029 - reject repair area;

(8) P040 - silo 1;

(9) P041 - silo 2;

(10) P042 - silo 3;

(11) P043 - silo 4;

(12) T003 - non-volatile material storage tank and dispensing;

(13) T004 - non-volatile material storage tank and dispensing;

(14) T014 - non-volatile material storage tank and dispensing; and

(15) T022 - refrigerant pressurized storage tank distn. System.

C. Emissions Unit Terms and Conditions

1. B035, Generator #2

Operations, Property and/or Equipment Description:

1135 hp, Emergency generator

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-13448)	Emissions shall not exceed : Nitrogen oxide (NOx) emissions of 24.0 pounds per hour; Carbon monoxide (CO) emissions of 6.4 pounds per hour; Volatile organic compound (VOC) emissions of 0.6 pound per hour; Particulate emissions (PE) of 2.7 pound per hour; and/or Sulfur dioxide (SO2) emissions of 3.8 pounds per hour. See Sections b)(2)a., c)(1), c)(2), d)(1), d)(2), d)(3), e)(1), and f)(1)a., below.
b.	OAC rule 3745-31-05(D)	Emissions shall not exceed : Nitrogen Oxides (NOx) emissions of 6.0 tons per rolling, 12-month summation; Carbon monoxide (CO) emissions of 1.59 tons per rolling, 12-month summation; Volatile organic compound (VOC) emissions of 0.15 tons per rolling, 12-month summation; Particulate emissions (PE) of 0.68 tons per rolling, 12-month summation; and/or Sulfur dioxide (SO2) emissions of 0.95 tons per rolling, 12-month summation. See Section f)(1)a., below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. See Section f)(1)b., below.
c.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input. See Section f)(1)c., below.
d.	OAC rule 3745-18-06	This unit is exempt per OAC rule 3745-18-06(B). See Section b)(2)b., below.

(2) Additional Terms and Conditions

a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.

[Authority for term 3745-77-07(A)(3), PTI 05-13448]

b. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

(2) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for this emissions unit:

a. the total hours of operation for this emissions unit for each month; and

b. the rolling, 12-month summation of operating hours.

[Authority for term 3745-77-07(A)(3)(b), PTI 05-13448]

(2) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate (in lbs/MMBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (for example, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[Authority for term 3745-77-07(A)(3)(a) & (b), PTI 05-13448]

(3) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3)(b), PTI 05-13448]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances the total rolling, 12-month hours of operation exceeds 500;

b. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and

c. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

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

[Authority for term 3745-77-07(A)(3)(c), PTI 05-13448]

f) Testing Requirements

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

a. Emission Limitations:

i. NOx - 24.0 lbs/hr and 6.0 tons/rolling, 12-month summation

ii. CO - 6.4 lbs/hr and 1.59 tons/rolling, 12-month summation

iii. VOC - 0.6 lb/hr and 0.15 tons/rolling, 12-month summation

iv. PE - 2.7 lbs/hr and 0.68 tons/rolling, 12-month summation

v. SO2 - 3.8 lbs/hr and 0.95 tons/rolling, 12-month summation

Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 7.49 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NOx, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO2, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU. If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton.

If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

c. Emission Limitation:

0.062 lb PE/mmBtu

Applicable Compliance Limit:

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.

[Authority for term 3745-77-07(C), PTI 05-13448]

g) Miscellaneous Requirements

(1) None.

2. B409, Generator #3

Operations, Property and/or Equipment Description:

1232 HP generator, was moved from MMP to ELP on July of 2003

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-13448)	Emissions shall not exceed: Nitrogen oxide (NOx) emissions of 28.5 pounds per hour; Carbon monoxide (CO) emissions of 7.64 pounds per hour; Volatile organic compound (VOC) emissions of 0.7 pound per hour; Particulate emissions (PE) of 3.2 pound per hour; and Sulfur dioxide (SO2) emissions of exceed 4.5 pounds per hour. See Sections b)(2)a., c)(1), c)(2), d)(1), d)(2), d)(3), e)(1), and f)(1)a., below.
b.	OAC rule 3745-31-05(D)	Emissions shall not exceed: Nitrogen Oxides (NOx) emissions of 7.12 tons per rolling, 12-month summation. Carbon monoxide (CO) emissions of 1.9 tons per rolling, 12-month summation. Volatile organic compound (VOC) emissions of 0.18 tons per rolling, 12-month summation; Particulate emissions (PE) of 0.8 tons per rolling, 12-month summation; and/or Sulfur dioxide (SO2) emissions of 1.13 tons rolling, 12-month summation. See Section f)(1)a., below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. See Section f)(1)b., below.
d.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input. See Section f)(1)c., below.
e.	OAC rule 3745-18-06	This unit is exempt per OAC rule 3745-18-06(B). See Section b)(2)b., below.

(2) Additional Terms and Conditions

a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.

[Authority for term 3745-77-07(A)(3), PTI 05-13448]

b. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

(2) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

[Authority for term 3745-77-07(A)(1), PTI 05-13448]

d) .Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for this emissions unit:

a. the total hours of operation for this emissions unit for each month; and

b. the rolling, 12-month summation of operating hours.

[Authority for term 3745-77-07(A)(3)(b), PTI 05-13448]

(2) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate (in lbs/MMBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (for example, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

[Authority for term 3745-77-07(A)(3)(a) & (b), PTI 05-13448]

(3) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3)(b), PTI 05-13448]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances the total rolling, 12-month hours of operation exceeds 500;

b. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and

c. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

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

[Authority for term 3745-77-07(A)(3)(c), 3745-15-03(B)(1)(a), and 3745-15-03(C),PTI 05-13448]

f) Testing Requirements

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

a. Emission Limitations:

i. NOx - 28.5 lbs/hr and 7.12 tons/rolling, 12-month summation;

ii. CO - 7.64 lbs/hr and 1.9 tons/rolling, 12-month summation;

iii. VOC - 0.7 lb/hr and 0.18 tons/rolling, 12-month summation;

iv. PE - 3.2 lbs/hr and 0.8 tons/rolling, 12-month summation; and

v. SO2 - 4.5 lbs/hr and 1.13 tons/rolling, 12-month summation

Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 8.91 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NOx, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO2, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton.

If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

c. Emission Limitation:

0.062 lb PE/mmBtu

Applicable Compliance Limit:

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.

[Authority for term 3745-77-07(C), PTI 05-13448]

g) Miscellaneous Requirements

(1) None.

3. F096, Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas at East Liberty (ELP)

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-8339)	Particulate emissions (PE) shall not exceed 23.22 tons per year. Particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM10) shall not exceed 5.25 tons per year. There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period. There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period. best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust See Sections b)(2)c., thru j, d)(1) thru (4), e)(1) and f)(1)a. thru b., below.
b.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See Section b)(2)k, below.

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. ID 1 - Truck entrance;

ii. ID 2 - South truck dock area;

iii. ID 3 - Container storage yard;

iv. ID 4 - Associate entrance drive;

v. ID 5 - Associate parking;

vi. ID 6 - Test track;

vii. ID 7 - Brake test area;

viii. ID 8 - North truck dock area;

ix. ID 9 - Access road to east side;

x. ID 10 - Access road to north side;

xi. ID 11 - AQG building FTZ parking;

xii. ID 12 - AQG associate parking lot;

xiii. ID 13 - Gas plaza;

xiv. ID 14 - AH car storage;

xv. ID 15 - AH entry drive;

xvi. ID 16 - AH truck staging; and

xvii. ID 17 - AH railcar staging.

b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. ID U1 - Rapp-Dean Road (behind ELP); and

ii. ID U2 - Access to sub-station.

c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ vacuum assisted sweeping for the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved shoulders as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved roadway and parking area as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

i. The permittee shall require operators of open-bodied vehicles transporting materials likely to become airborne to keep such materials covered if the control measure is necessary for the materials being transported.

j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

k. This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).

[Authority for term 3745-77-07(A)(1), PTI 05-8339]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise specified in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

a. for all paved roadways and parking areas, as identified in b)(2)a., the minimum inspection frequency shall be weekly; and

b. for all unpaved roadways and parking areas, as identified in b)(2)b., the minimum inspection frequency shall be weekly.

After the permittee has performed weekly inspections of the paved and the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved and the unpaved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions.

[Authority for term 3745-77-07(A)(3), PTI 05-8339]

(2) The purpose of the inspections is to determine the need for implementing the additional control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term 3745-77-07(A)(3), PTI 05-8339]

(3) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures. The information required in (3)d. shall be kept separately for:

i. the paved roadways and parking areas; and

ii. the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term 3745-77-07(A)(3), PTI 05-8339]

(4) Reconfiguration of the roadways and parkways areas and variations in traffic patterns at this facility may not be a modification under OAC rule 3745-31-01 as long as emissions are equal to or less than the established PTI limitations. If the change is determined to be a modification then the permittee must apply for and obtain a permit to install prior to the installation of the change.

[Authority for term 3745-77-07(A)(1), PTI 05-8339]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each instance when an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), and 3745-15-03(C),PTI 05-8339]

f) Testing Requirements

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

a. Emission Limitation:

There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance shall be determined based on the records under Section d)(1) of this permit.

If required, compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

PE shall not exceed 23.22 tons per year.

PM10 shall not exceed 5.25 tons per year.

The allowable limitations were based on the following equations:

Paved Roads:

E = k(sL/2)0.65 (W/3)1.5 (1-P/4N)*

Where:

E = particulate emission factor (pounds/VMT);

k = constant - 0.082 for PE and 0.016 for PM10 (particle size multiplier for pounds/VMT);

sL = road surface silt loading (g/m2);

W = mean vehicle weight in tons;

P = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.1-2, AP-42, section 13.2.1); and

N = number of days in the averaging period = 365 days/year.

Unpaved Roadways:

E = k(s/12)a(W/3)b [(365 - p)/365]*

Where;

E = size-specific particulate emission factor (lb/VMT);

k = constant - 4.9 for PE and 1.5 for PM10 (particle size multiplier for pounds/VMT);

s = surface material silt content;

W = mean vehicle weight in tons;

a = constant - 0.7 for PE and 0.9 for PM10;

b = constant - 0.45for both PE and PM10; and

p = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.2-1, AP-42, section 13.2.2.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping and reporting requirements under Sections d) and e) of this permit.

[Authority for term 3745-77-07(C), PTI 05-8339]

g) Miscellaneous Requirements

(1) None.

4. K001, EDP Coating Line

Operations, Property and/or Equipment Description:

EDP coating line

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.	OAC rule 3745-31-05(A)(3) and (PTI P0105436)	Volatile organic compound (VOC) emissions shall not exceed 1.12 lbs/gallon of coating, as applied excluding water and exempt solvents (free solvent). Emissions from natural gas combustion in the drying oven and the incinerator: 0.05 lb PM10/hr; 0.06 lb SO2/hr; 1.00 lb NOx/hr; 0.81 lb CO/hr; and 0.05 lb VOC/hr.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements).	See Sections b)(2)c. and d., c)(2), d)(1)-(4), (6), e)(1), f)(1)c., and d., below.
c.	OAC rule 3745-21-09(C)(1)(a)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	See Section b)(2)h., below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	See Section b)(2)i., below.
g.	OAC rule 3745-17-10(B) (for the indirect-fired ovens associated with this emissions unit)	The PE limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-07(A) (for indirect-fired ovens associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
i.	40 CFR 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
j.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
k.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections c)(5), d)(8), and e)(1), below.

(2) Additional Terms and Conditions

a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

b. This emissions unit shall not exceed the following:

i. When the solids turnover ratio (R_T)* is 0.160 or greater:

(a) VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average; and

(b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.

ii. When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:

(a) VOC emissions from the free solvent shall not exceed 0.7 x $350^{(0.160- RT)}$ lb/gas, as a monthly volume-weighted average; and

(b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 x $350^{(0.160- RT)}$ lb/gas, as a monthly volume-weighted average.

iii. When the solids turnover ratio (R_T)* is less than 0.040:

(a) No free solvent or total VOC emission limitation is applicable.

*R_T is calculated in accordance with OAC rule 3475-21-09(C)(1)(a)(ii).

[Authority for term 3745-77-07(A)(1), PTI P0105436]

c. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

d. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 , P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

e. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

f. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until

testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(2) below.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

g. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

h. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

i. The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1)]

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

(2) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

(3) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI P0105436]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 3745-77-07(A)(1), 40CFR 63.3093 through 63.3101, PTI P0105436]

(5) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

[Authority for term 3745-77-07(A)(1), 40CFR 64]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on all materials employed in this emissions unit:

a. the name and identification of each coating and solvent employed;

b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;

c. the number of gallons of each coating and solvent employed, in gallons;

d. the total VOC emissions from all coatings and solvent employed, (excluding cleanup and purge materials maintained in d)(4) in pounds per month, i.e., the summation of the materials employed (“b” x “c”));

e. the volume solids content of each coating added to the system;

f. the amount of solids, in gallons (“c” x “e” x transfer efficiency);

g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied (“d” / “f”);

h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;

i. the total uncontrolled cure volatile VOC emissions, in pounds per month (“h” x “c”);

j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results (“d” + “i” x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);

k. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids (“j” / “f”);

l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (ie, the total liquid volume contained in the e-coat system's tanks, pumps, recirculating lines, filters, etc. at the system's designed liquid operating level), in gallons; and

m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

**The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the cure volatile VOC emissions, in pounds per gallon, from the coatings (paste and resin e-coat blend). The cure volatiles for the coatings shall be calculated by subtracting the free solvent VOC content, as determined by formulation data or U.S. EPA Method 24, from the total VOC content, as determined by a Modified Method 24 adjusted for a higher curing oven temperature.

Cure Volatiles = Total VOC – Free Solvent.

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(2) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(3) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton; and

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(4) If a credit for recovered materials 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 tank serving the emissions units subject to the applicable VOC emission limitation (see b)(1) above):

a. the date the recovery tank was emptied;

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

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

d. the VOC content of the materials from the recovery 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 materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units at this facility and from the cleanup and purge materials applied in the emissions units listed in sections d)(4) and (5), above.

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(5) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(6) The permittee shall maintain the following monthly records on the number of units processed:

a. the total number units processed during the calendar month; and

b. the total number of units processed per rolling 12 month summation (the total number of units processed, for the current month ("a") plus the total number of units processed for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3)(b), PTI P0105436]

(7) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is

processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and

b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

[Authority for term 40 CFR 64, 40 CFR 60, Subpart MM, 3745-77-07(A)(3), PTI P0105436]

(8) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air pressure changes within the oven exhaust/thermal incinerator inlet for capture.

The combustion temperature indicator range for the thermal incinerator shall be all three hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance.

The air pressure change at the oven exhaust/thermal incinerator inlet is monitored by a(n) air pressure switch(s) that indicates if the oven exhaust system is operational. The pressure/vacuum across the switch drops if the oven exhaust system fails to operate. A lockout system is installed to prevent the oven associated with the emission unit from processing units when the oven exhaust system is off. If the oven exhaust system is equipped with a redundant pressure/vacuum switch, it shall not be considered a deviation to replace a failed switch while the oven associated with the emission unit continues to process units as long as the redundant switch is operational.

If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Authority for term 40 CFR64, 3745-77-07(A)(3)]

(9) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term [40 CFR 63.3093 through 63.3101, 3745-77-07(A)(3), PTI P0105436]

(10) If a credit for recovered materials 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 tank serving the emissions units subject to the applicable VOC emission limitation (see b)(1) above):

a. the date the recovery tank was emptied;

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

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

d. the VOC content of the materials from the recovery 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 materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units at this facility and from the cleanup and purge materials applied in the emissions units listed in sections d)(4) and (5), above.

(11) The permittee shall collect and maintain monthly records which contain the following information for materials added to the e-coat process:

a. the name and identification of each coating and solvent added to the EDP system; and

b. the VOC content of each coating and solvent (excluding water and exempt solvents), as added to the EDP system, in lbs VOC/gal.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. the VOC emissions rate, in pounds of “free” solvent VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by section b)(2)b. and recorded by section d)(2) of this permit;

b. the VOC emissions rate, in pounds of “total” (“free” plus “cured”) VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by section b)(2)b. and recorded by section d)(2) of this permit;

c. the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;

d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period;

e. the combined number of units processed is greater than 31,000 units per month and 267,000 units per rolling, 12-month summation;

f. 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; and

g. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Standard Terms and Conditions of this permit;

[Authority for term 3745-77-07(A)(3), PTI P0105436]

(2) The permittee shall notify the Ohio EPA, Southwest District Office in writing of any monthly record showing the use of non-complying coatings, exceeding 1.12 lbs VOC/gal coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days

[Authority for term 3745-77-07(A)(3), PTI P0105436]

(3) The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term 3745-77-07(A)(3), PTI P0105436]

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

[Authority for term 40 CFR 63.3110 through 63.3131, 3745-77-07(A)(3), PTI P0105436]

f) Testing Requirements

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

a. Emission Limitations:

When the solids turnover ratio (R_T)* is 0.160 or greater:

VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC

emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.

When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:

VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160- RT)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160- RT)}$ lb/gas, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the monthly record keeping requirements established in this permit.

b. Emission Limitation:

1.12 lbs VOC/gallon of coating, as applied, excluding water and exempt solvents (free solvent)

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping established in this permit.

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined,

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

e. Visible Emission Limitation:

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

f. Emission Limitations:

0.05 lb PM10/hr;

0.06 lb SO2/hr;

1.00 lb NOx/hr;

0.81 lb CO/hr; and

0.05 lb VOC/hr.

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (9,636 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft. If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.*** All PM is assumed to be PM10

[Authority for term 3745-77-07(A)(C), PTI P0105436]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet) The permittee shall conduct or have conducted an incinerator destruction efficiency test within 12 months prior to the applicable Title V permit expiration. The date of the last stack test for this emissions unit was performed on 8/19/09.

b. Emission testing shall be conducted to determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit, (at present the capture efficiency is assumed to be 95%, based on best engineering assumptions The permittee shall conduct or have conducted capture efficiency testing within 12 months prior to the applicable Title V permit expiration.

c. The following test methods shall be employed to demonstrate compliance:

i. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions); and

ii. The capture efficiency of the e-coat oven controlling cure volatiles shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office. The Ohio EPA, Southwest District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the

testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

[Authority for term 3745-77-07(C), PTI P0105436]

(3) Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Part 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

(4) Formulation data or USEPA Method 24 shall be used to determine the “free” volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit.

[Authority for term 3745-77-07(C), PTI P0105436]

(5) A modified USEPA Method 24 shall be used to determine the “cure” volatile organic compound content of materials added to this emissions unit. The modified USEPA Method 24 shall be performed at process temperatures to appropriately identify “cure” volatile emissions generated in the curing process for the emissions unit.

[Authority for term 3745-77-07(C), PTI P0105436]

g) Miscellaneous Requirements

(1) None.

5. K002, Sealer/Deadener Coating Line

Operations, Property and/or Equipment Description:

Robotic and manual sealer and deadener application equipment, natural gas-fired air supply houses, bake oven and thermal oxidizer

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.	OAC rule 3745-31-05(A)(3) and (PTI P0105010)	Volatile organic compound (VOC) emissions shall not exceed 14.1 lbs per hour. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator : 0.06 lb PE(filterable)/hr; 0.02 lb SO2/hr; 3.3 lbs NOx/hr; 2.8 lbs CO/hr; and 0.2 lb VOC/hr
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements)	See Sections b)(2)a. and b, c)(2), d)(4), (6), (7), (8) e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-21-09(U)(1)(i)	The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
d.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the fuel burning equipment associated with this emissions unit).

e.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)e, below.
f.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)f, below.
g.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-11(C)	See Section b)(2)g, below.
i.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. See Sections c)(5) and d)(4), below
j.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(2) and e)(1), below.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

c. The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the 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.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

d. The hourly natural gas emission limitations are based on potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(17).

[Authority for term 3745-77-07(A)(1), PTI P0105010]

f. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

g. OAC rule 3745-17-11(A)(1)(j) exemption for surface coating processed (eg. Sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) applicable methods. This source meets this exemption therefore 17-11(C) does not apply.

[Authority for term 3745-77-07(A)(1)]

h. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

[Authority for term 40 CFR 64, 3745-77-07(A)(1)]

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

(2) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

(3) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

(5) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

[Authority for term 3745-77-07(A)(1), PTI P0105010]

d) Monitoring and/or Recordkeeping Requirements

(1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and

b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

[Authority for term 40 CFR 64, 3745-77-07(A)(3), PTI P0105010]

(2) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air pressure changes within the oven exhaust/thermal incinerator inlet for capture.

The combustion temperature indicator range for the thermal incinerator shall be all three hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance.

The air pressure change at the oven exhaust/thermal incinerator inlet is monitored by a(n) air pressure switch(s) that indicates if the oven exhaust system is operational. The pressure/vacuum across the switch drops if the oven exhaust system fails to operate. A lockout system is installed to prevent the oven associated with the emission unit from processing units when the oven exhaust system is off. If the oven exhaust system is equipped with a redundant pressure/vacuum switch, it shall not be considered a deviation to replace a failed switch while the oven associated with the emission unit continues to process units as long as the redundant switch is operational.

If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Authority for term 40 CFR 64, 3745-77-07(A)(3)]

(3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI P0105010]

(4) The permittee shall collect and record the following information each month for this emissions unit:

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

b. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents;

c. the amount of each coating employed, in gallons per month, excluding water and exempt solvents;

d. the VOC generated from each coating, in tons per month (the summation of [("b" x "c")/ 2000 lbs/ton]);

e. the total VOC generated by all coating employed in this emissions unit, in tons per month (the summation of all "d" for all coating employed in this emissions unit;

f. the total controlled VOC emissions, for all the coatings employed, in tons per month (the summation of {[("e" x the capture efficiency) x (1- the control efficiency)] + ["e" x (1- the capture efficiency)]}; and

g. the rolling, 12-month total combined VOC emitted from this emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("f") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI P0105010]

(5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

[Authority for term 40 CFR 63.3110 through 63.3131, 3745-77-07(A)(3), PTI P0105010]

(6) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI P0105010]

(7) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI P0105010]

(8) The permittee shall maintain the following monthly records on the number of units processed:

a. The total number of units processed during the calendar month: and

b. The total number of units processed per rolling 12 month summation (the total number of unit processed, for the current month ("a") plus the total number of units processed for the 11 previous calendar months.

[Authority for term 3745-77-07(A)(3), PTI P0105010]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above.;

b. all instances when a fuel other than natural gas was burned in this emissions unit;

c. all instances when the total product exceeds 31,000 units per month;

d. all instances when the total product exceeds 267,000 units per rolling, 12-month;

e. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation;

f. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, exceeds 38.44 tons/month and/or 103.3 tons per rolling, 12-month summation; and

g. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

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), PTI P0105010]

(2) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing an exceedance of the VOC content limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Southwest District Office within thirty (30) days after the end of the calendar month in which the exceedance occurs.

[Authority for term 3745-77-07(A)(3), PTI P0105010]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

[Authority for term 3745-77-07(A)(3), PTI P0105010]

f) Testing Requirements

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

a. Emissions Limitation:

3.0 lbs VOC/gallon of coating, excluding water and exempt solvent, as applied.

Applicable Compliance Method:

Compliance with this limit shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

0.06 lb PE (filterable)/hr;

0.02 lb SO2/hr;

3.3 lbs NOx/hr;

2.8 lbs CO/hr; and

0.2 lb VOC/hr.

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (32,353 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

e. Emission limitation:

14.1 lbs VOC/hr

The hourly emission limitation is based on the following equation:

Eh = (VOCu x Be) + {[VOCu x (1 - Be)] x (1 - De)}

Where:

HER = maximum Hour Emission Rate, in lbs of VOC per hour;

VOCu = the maximum VOC usage of 60.01 pounds (this is based upon maximum usage and maximum VOC content for both the sealer materials and deadner materials);

Be = the maximum uncaptured emissions from the booth based upon engineering estimates of 15% or 0.15[1.]; and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

Applicable Compliance Method:

Compliance is based on the assumption that the above data represents the maximum production rate, minimal capture efficiency, and minimal destruction efficiency of these emissions unit, its ventilation system, and control device. Any changes in these assumptions may trigger additional air pollution permit review.

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[1.] Based upon the analytical test results of the deadner and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 85%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

f. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart IIII 63.3091 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall demonstrate compliance using the applicable methods detailed in 63.3150 through 63.3152 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

[Authority for term 3745-77-07(C), PTI P0105010]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio

EPA, Southwest District Office. The date of the last stack test for this emissions unit was performed on 8/18/09.

b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.

c. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

[Authority for term 3745-77-07(C), PTI P0105010]

(3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI P0105010]

g) Miscellaneous Requirements

(1) None.

6. K003, Guidecoat Line

Operations, Property and/or Equipment Description:

Primer/Surfacer coating booths with manual and robotic application equipment, and natural gas-fired air supply houses, bake ovens and thermal oxidizer

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007. 149.9 lbs VOC per hour. 5.4 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.20 lb PM10/hr 0.02 lb SO2/hr 4.05 lbs NOx/hr 3.40 lbs CO/hr 0.21 lb VOC/hr.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements.)	See Sections b)(2)a. and b., c)(2), d)(3), (4), e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)g., below.
e.	40 CFR, Part 60, Subpart MM	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-09(C)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
h.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	b)(2)e, below.
i.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	b)(2)f, below.
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
k.	OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
l.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
m.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(2), and e)(1), below.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)(3)]

h. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(4) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is in operation.

[Authority for term 3745-77-07(A)(1), 3745-17-11 (C), PTI 05-07923]

(5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

(6) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

[Authority for term 40 CFR 64, 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and

b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

[Authority for term 40 CFR 60, Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(2) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance indicators for VOC emissions include combustion temperature for destruction and air pressure changes within the oven exhaust/thermal incinerator inlet for capture.

The combustion temperature indicator range for the thermal incinerator shall be all three hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance.

The air pressure change at the oven exhaust/thermal incinerator inlet is monitored by a(n) air pressure switch(s) that indicates if the oven exhaust system is operational. The pressure/vacuum across the switch drops if the oven exhaust system fails to operate. A lockout system is installed to prevent the oven associated with the emission unit from processing units when the oven exhaust system is off. If the oven exhaust system is equipped with a redundant pressure/vacuum switch, it shall not be considered a deviation to replace a failed switch while the oven associated with the emission unit continues to process units as long as the redundant switch is operational.

If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Authority for term 40 CFR 64, 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(5) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:

a. the name and identification number of each coating;

b. the amount of each coating employed, in gallons per month;

c. the VOC content of each coating employed, in pounds of VOC per gallon;

d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and

i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

[Authority for term 40 CFR 60, Subpart MM, 3745-77-07(A)(3), 3745-21-09 (C)(4), PTI 05-07923]

(6) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-17-11(C)(3),3745-77-07(A)(3), PTI 05-07923]

(8) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances when a fuel other than natural gas was burned in this emissions unit;

b. all instances when the total product exceeds 31,000 units per month;

c. all instances when the total product exceeds 267,000 units per rolling, 12-month;

d. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation;

e. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, exceed 38.44 tons/month and/or 103.3 tons per rolling, 12-month summation;

f. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings;

g. 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; and

h. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

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)]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

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 methods:

a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

5.4 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the record keeping requirements established in this permit.

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.

e. Emission Limitations:

0.20 lb PM10/hr;

0.02 lb SO2/hr;

4.05 lbs NOx/hr;

3.40 lbs CO/hr; and

0.21 lb VOC/hr

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be assumed based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10.

f. Emission limitation:

149.9 lbs VOC per hour

The above allowable is established based on the following equation:

HER = {[(Cu x VC) x Ce] x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents;

Ce = capture efficiency (as determined during the most recent compliance demonstration); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance demonstration).

Applicable Compliance Method:

If required, compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

g. Emission Limitation:

Visible PE from overspray associated with this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA. The date of the last stack test for this emissions unit was performed on 8/14/09.

b. Destruction efficiency testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance:

i. Method 1thru 4, of 40 CFR, Part 60, Appendix A (for sample and velocity traverses); and

ii. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be

conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

[Authority for term 3745-77-07(C), PTI 05-07923]

(3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

7. K007, Primary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake 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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007. 89.3 lbs VOC per hour. 5.19 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven and air supply houses for K007 and K008, combined, shall not exceed the following: 0.21 lb PM10/hr 0.025 lb SO2/hr 4.08 lbs NOx/hr 3.43 lbs CO/hr 0.22 lb VOC/hr See Sections b)(2)a. thru d, c)(1) and (3), d)(1) thru (3), (5) and (6), e)(1), f)(1)a., and f)(1)d. thru h., below.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements)	See Sections b)(2)a. and b., c)(1), d)(4), e)(1), f)(1)b., and c., below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)g., below.
e.	40 CFR, Part 60, Subpart MM, 60.392(b)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined). See Sections d)(4), and e)(1), below.
g.	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average. See Sections d)(4), and e)(1), below.
h.	OAC rule 3745-21-09(C)(1)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
j.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2)e., below.
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2)f., below.
l.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
m.	OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
n.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The 89.3 lbs VOC per hour limitation was established for permitting purposes to reflect the 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10

pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-11(C)(3)]

c) Operational Restrictions

(1) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C), PTI 05-07923]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:

a. the name and identification number of each coating;

b. the amount of each coating employed, in gallons per month;

c. the VOC content of each coating employed, in pounds of VOC per gallon;

d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and

i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

[Authority for term 40CFR 60, Subpart MM, 3745-77-07(A)(3), 3745-21-09 (C)(4), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

a. the name and identification number of each topcoat employed;

b. the number of gallons employed of each coating;

c. the VOC content, in pounds of VOC per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and

j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

[Authority for term 40 CFR 60, Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(5) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(6) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(8) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances when a fuel other than natural gas was burned in this emissions unit;

b. all instances when the total product exceeds 31,000 units per month;

c. all instances when the total product exceeds 267,000 units per rolling, 12-month;

d. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or

e. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall exceed 38.44 tons/month and/or 103.3 tons per rolling, 12-month summation; and

f. any record showing that the overspray control system was not in service when the emissions unit was in spray applying coatings.

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)]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;

b. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or

c. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.176, 3745-77-07(A)(3), PTI 05-07923]

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 methods:

a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitation:

1.47 kg VOC/liter of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit..

d. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

e. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

f. Emission Limitations:

5.19 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance with the allowable particulate emission (PE) limitation shall be determined through the record keeping requirements established in this permit on the maintenance of the overspray control system.

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.

g. Emission Limitations:

0.21 lb PM10/hr;

0.025 lb SO2/hr;

4.08 lbs NOx/hr;

3.43 lbs CO/hr; and

0.22 lb VOC/hr

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

h. Emission limitation:

89.3 lbs VOC per hour

The above allowable is established based on the following equation:

HER = (Cu x VC)

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

i. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

8. K008, Secondary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake 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.	OAC rule 3745-31-05(A)(3) and (PTI 05-7923)	The emissions from this emissions unit shall not exceed: 8.7 lbs volatile organic compounds (VOC) per hour ; and 0.42 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following: 0.21 lb PM10/hr; 0.025 lb SO2/hr; 4.08 lbs NOx/hr; 3.43 lbs CO/hr; and 0.22 lb VOC/hr. See Sections b)(2)a., b., c., c)(1), thru (3), d)(1) thru (3), (5), and (6), e)(1), f)(1)a. thru d., f., and g., and f)(2), below.
b.	OAC rule 3745-31-05(D) (in order to minimize VOC emissions and avoid PSD requirements).	See Sections b)(2)a. and b., c)(1), d)(4), e)(1), f)(1)b., and c., below.

c.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)g., below.
e.	40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
g.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
h.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2)e., below.
i.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)f., below
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
k.	OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
l.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

c. The 8.7 lbs VOC per hour limitation was established for permitting 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.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

f. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

[Authority for term 3745-77-07(A)(3), 3745-17-11 (C)]

c) Operational Restrictions

(1) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

a. the name and identification number of each topcoat employed;

b. the number of gallons employed of each coating;

c. the VOC content, in pounds of VOC per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids;

i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and

j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for

"Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

[Authority for term 40 CFR 60 Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units processed, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar month.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

(6) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances when a fuel other than natural gas was burned in this emissions unit;

b. all instances when the total product exceeds 31,000 units per month;

c. all instances when the total product exceeds 267,000 units per rolling, 12-month;

d. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and

e. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, exceeds 38.44 tons/month and/or 103.3 tons per rolling, 12-month summation; and

f. any record showing that the overspray control system was not in service when the emissions unit was in spray applying coatings.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C), PTI 05-07923]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or

b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

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 methods:

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

8.7 pounds of VOC per hour

The above allowable is based on the following equation:

HER = Mcu x VOCc

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour; and

VOCc = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

e. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

f. Emission Limitations:

0.42 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred;

and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping established in this permit.

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.

g. Emission Limitations:

0.21 lb PM10/hr;

0.025 lb SO2/hr;

4.08 lbs NOx/hr;

3.43 lbs CO/hr; and

0.22 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

9. K009, Wax/Polish Coating Line

Operations, Property and/or Equipment Description:

Coating booths with manual wax application equipment and natural gas-fired air supply houses

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based on a monthly volume weighted average of all the coatings employed in this emissions unit. [this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(d)] 87.2 lbs VOC per hour; 0.29 lb particulate emissions (PE) per hour, for over spray Emissions from natural gas combustion in the air supply houses: 0.07 lb PM10/hr; 0.009 lb SO2/hr; 1.49 lbs NOx/hr; 1.25 lbs CO/hr; and 0.08 lb VOC/hr See Sections b)(2)a. thru d., c)(1) and (4), d)(1) thru (4), and (6), e)(1), f)(1)a. thru g., and f)(2), below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements).	See Sections b)(2)a. and b., c)(3), d)(6), e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)h., below.
e.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoat employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
g.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
h.	OAC rule 3745-21-09(U)(2)(f)	b)(2)g, see below
i.	OAC rule 3745-17-(11)(B) (for the air supply houses associated with this emissions unit)	b)(2)e, see below
j.	OAC rule 3745-17-07(A) (for the air supply houses associated with this emissions unit)	b)(2).f, below
k.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The 87.2 lbs VOC per hour limitation was established for permitting 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the air supply houses were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The PE from the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 05-07923, is a control requirement or emission limitation that is either less stringent than or

inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

h. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C), PTI 05-07923]

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

a. the name and identification number of each topcoat employed;

b. the number of gallons employed of each coating;

c. the VOC content, in pounds of VOC per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids;

i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and

j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

[Authority for term 40 CFR 60, Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on all coatings other than topcoats employed in this emissions unit:

a. the name and identification number of each coat employed;

b. the amount of each coat employed, in gallons per month, excluding water and exempt solvents;

c. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents;

d. the calculated VOC generated from each coat employed, in pounds of VOC per month, (the summation of "b" x "c");

e. the combined VOC emissions from all of the non-topcoat coatings employed in this emissions unit, in pounds of VOC per month (the summation of "d" from all of the non-topcoat coatings employed in this emissions unit);

f. the combined non-topcoat coating usage employed in this emissions unit, in gallons per month, (summation of "b" from all of the non-topcoat coatings employed in this emissions unit); and

g. the volume weighted average VOC content of all non-topcoat coatings employed in this emissions unit, in pounds of VOC per gallon, excluding water and exempt solvents.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;.

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

(6) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. the VOC content of the coatings employed in this emissions unit, excluding topcoat operations, exceeds 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit;

b. all instances when a fuel other than natural gas was burned in this emissions unit;

c. all instances when the total product exceeds 31,000 units per month;

d. all instances when the total product exceeds 267,000 units per rolling, 12-month;

e. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or

f. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and/or 103.3 tons per rolling, 12-month summation.

g. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

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)]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or

b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1), of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009* and K012*, combined].

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping established in this permit.

d. Emission Limitations:

The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based on a monthly volume weighted average of all the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitations shall be determined through the record keeping requirements established in this permit.

e. Emission Limitations:

0.29 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

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.

f. Emission Limitations:

87.2 pounds of VOC per hour

The above allowable is based on the following equation:

HER = Mcu x VOCc

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour; and

VOCc = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

g. Emission Limitations:

0.07 lb PM10/hr;

0.009 lb SO2/hr;

1.49 lbs NOx/hr;

1.25 lbs CO/hr; and

0.08 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

i. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

10. K011, Final Repair

Operations, Property and/or Equipment Description:

Coating booths and area including manual coating applicators for final off-line repair and infrared bake ovens/lamps

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-7923)	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 15.8 lbs per hour; and 1.26 lbs of particulate emissions (PE) per hour Emissions from natural gas combustion: 0.04 lb PM10/hr; 0.005 lb SO2/hr; 0.85 lbs NOx/hr; 0.72 lb CO/hr; and 0.05 lb VOC/hr. See Sections b)(2)a and b, and b)(2)d., below.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements)	See Sections b)(2)a. and b., c)(1), d)(5), e)(2), f)(1)b., and c., below.
c.	OAC rule 3745-31-05(D)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6 tons per rolling 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)g., below.
e.	OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
f.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-17-11(B) (for the oven associated with this emissions unit)	See section b)(2)e, below.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
i.	OAC rule 3745-17-07(A) (for the oven associated with this emissions unit)	See section b)(2)f, below.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The 15.8 lbs VOC per hour limitation was 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The PE for the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan. 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c) Operational Restrictions

(1) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that list the following information on the coatings employed in this emissions unit:\

a. the name and identification number of each coating;

b. the number of gallons employed;

c. the VOC content, in pounds per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the daily volume weighted VOC content of all coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

f. the water and exempt solvents content, in percent by volume;

g. the nonvolatile (solids) content, in percent by volume; and

h. calculations showing the 12-month VOC emissions, in tons per rolling 12-month period.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(5) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(6) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. the VOC emissions from the use of coatings exceed 6.0 tons per rolling 12-month period;

b. the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and

c. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period;

d. all instances when a fuel other than natural gas was burned in this emissions unit;

e. all instances when the total product exceeds 31,000 units per month;

f. all instances when the total product exceeds 267,000 units per rolling, 12-month; and

g. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C)]

(2) The permittee shall submit deviation (excursion) reports that identify the following:

a. all exceedances of the allowable 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average.

These exceedance records shall be sent within forty five (45) days following the exceedance.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

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. Emissions Limitation:

4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitation:

0.04 lb PM10/hr;

0.005 lb SO2/hr;

0.85 lbs NOx/hr;

0.72 lb CO/hr; and

0.05 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (8,525 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit..

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10

e. Emission Limitation:

15.8 lbs VOC/hr;

The above allowable was based on the following equation:

HER = [Cu * VC]

Where:

HER = maximum Hourly Emission Rate, in lbs of VOC/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

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 shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

1.26 pounds PE/hr, from coating overspray

The above allowable was based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

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.

h. Emission limitation:

6.0 tons of VOC per rolling 12-month period

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in d)(1).

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

11. K012, Specialty Topcoat Coating and On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat coating and on-line repair booths, natural gas-fired air supply house, bake oven, and thermal oxidizer.

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 17.4 lbs per hour; and 0.5 lbs of particulate emissions (PE) per hour. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.14 lb PM10/hr; 0.02 lb SO2/hr; 2.85 lbs NOx/hr; 2.40 lbs CO/hr; and 0.15 lb VOC/hr. See Sections b)(2)a., b., c., and e., below.
b.	OAC rule 3745-31-05(D) (in order to minimize VOC emissions and avoid PSD requirements)	See Sections b)(2)a. and b., c)(2), d)(8), e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)h., below.
e.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
g.	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)
h.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
i.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2)f, below.
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2)g, below.
l.	OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
m.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The VOC emissions from the use of topcoats that are baked in the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

The requirement to vent emissions to a thermal oxidizer does not include emissions from any topcoat that is air-dried. Air-dry coatings are materials that do not require baking to fully cure and baking is not required to ensure the performance characteristics of the coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The 17.4 lbs VOC per hour limitation was 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule

3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

h. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan. 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units and applying any topcoat that requires baking, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

(5) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

a. the name and identification number of each topcoat employed;

b. the number of gallons employed of each coating;

c. the VOC content, in pounds of VOC per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and

i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

[Authority for term 40 CFR 60, Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on all coatings used to coat miscellaneous metal parts in this emissions unit:

a. the name and identification number of each coat employed; and

b. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(3), PTI 05-07923]

(6) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units and applying any topcoat that requires baking. 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.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units and applying topcoat that requires baking, was more than 50

degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the oven associated with this emissions unit is processing units.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(8) The permittee shall maintain the following monthly records on number of units processed through this emissions unit:

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(9) The permittee shall maintain the following monthly records on all non-topcoat coating used to coat the surface of automobiles and light-duty trucks in this emissions unit:

a. the name and identification number of each coating employed; and

b. the VOC content of each coating employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(10) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

(11) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above;

b. all instances when a fuel other than natural gas was burned in this emissions unit;

c. the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;

d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month an/or 103.3 tons per rolling 12-month period;

e. all instances when the total units produced in this emission unit exceeds 31,000 units per month;

f. all instances when the total units produced in this emission unit exceeds 267,000 units per rolling, 12-month period;

g. the VOC content of coatings employed in coating miscellaneous metal parts in this emissions unit exceeds 3.0 lbs of VOC per gallon, minus water and exempt solvents; and

h. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C), PTI 05-07923]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or

b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(3), PTI 05-07923]

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 methods:

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

0.14 lb PM10/hr;

0.02 lb SO2/hr;

2.85 lbs NOx/hr;

2.40 lbs CO/hr; and

0.15 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10.

e. Emission limitation:

17.4 lbs VOC per hour

The above allowable were determined based on the following equation(s) and information:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

HER = {[(Cu x VC) x Ce] x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

0.5 pounds of particulate emissions (PE) per hour, from overspray

The above allowable were determined based on the following equation(s) and information:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

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.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) If required permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

b. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

[Authority for term 3745-77-07(C), PTI 05-07923]

(3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

12. K013, Assembly Miscellaneous Coating Line

Operations, Property and/or Equipment Description:

Application of primer on metal surfaces for the installation of fixed quarter and windshield glass.

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents, (this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i), (see section b)(2)b., below.). The VOC emissions shall not exceed 19.6 pounds per hour nor 29.2 tons per rolling, 12-month summation, for all the coatings employed. The organic compound (OC) emissions, from the use of liquid organic material, not involved in coating metal parts, shall not exceed 5.8 pounds per hour nor 9.98 tons per rolling, 12-month summation. See sections b)(2)a., c)(1) and (2), d)(1),(2), and (4), e)(1), f)(1)a., b., c., d., and e., below.
b.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
c.	OAC rule 3745-21-09(U)(2)(f)(ii)	Alternative reasonably available control technology emission limitation, when coating miscellaneous metal parts. See section b)(2)b., below
d.	OAC rule 3745-21-07(G)	When coating non-metal parts. See sections b)(2)c., c)(2), d)(2), and e)(3), below.
e.	OAC rule 3745-17-11(C)	See Section b)(2)d., below.

(2) Additional Terms and Conditions

a. The 19.6 lbs VOC per hour limitation and the 5.8 lbs OC per hour limitation were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limits.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the director has determined that "best available technology" for this emissions unit, as defined in PTI # 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

i. Section c)2);

ii. Section d)(2), recordkeeping requirements; and

iii. Section e)(3), reporting requirements.

[Authority for term 3745-77-07(A)(1), 3745-21-07, PTI 05-07923]]

d. OAC rule 3745-17-11(A)(1)(h) and (j) exemption for surface coating processes (eg. Sealers, adhesives, roll coatings, brush coatings and deadeners) that employ airless spray, brush coating and bead-type (extrusion) application methods. This source meets this exemption therefore 17-11(C) does not apply.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c) Operational Restrictions

(1) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall not employ any liquid organic material, except for those materials employed to coat metal parts, which is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all the miscellaneous metal coatings employed for this emissions unit:

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

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

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B);

e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in

gallons, of each coating employed (c), and sum the results for all the coatings employed; and

f. the rolling, 12-month VOC emissions for all the coatings employed, in tons.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:

a. the name and identification number of each liquid organic material employed;

b. whether or not the liquid organic material is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);

c. the VOC and organic compound (OC) contents for each liquid organic material employed, in pounds per gallon;

d. the volume, in gallons, of each liquid organic material employed;

e. the total VOC and OC emission rates, in tons, per month;

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("e") plus the total amount of VOC emissions for the 11 previous calendar months): and

g. the rolling, 12-month total combined OC emitted from the above listed emissions units, in tons (the total individual OC emitted, in tons, for the current month ("e") plus the total amount of OC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(3), PTI 05-07923]

(4) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. the monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents;

b. the VOC emissions exceed 29.2 tons per rolling, 12-month summation, for all the coatings employed;

c. the organic compound (OC) emissions, from the liquid organic materials, not related to the metal coating operations in this emissions unit, exceed 9.98 tons per rolling, 12-month summation; and

d. all instances when the total product exceeds 31,000 units per month;

e. all instances when the total product exceeds 267,000 units per rolling, 12-month.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C), PTI 05-07923]

(2) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions from the coatings employed shall not exceed 19.6 pounds hour.

The above allowable were determined based on the following equation(s) and information:

HER = [Cu * VC]

Where:

HER = the maximum VOC Hourly Emission Rate, in lbs/hr;

Cu = the maximum potential coating usage rate, in gallons/hr; and

VC = the maximum coating VOC content, in pounds per gallon.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: The OC emissions from the use of miscellaneous solvents employed shall not exceed 5.8 pounds hour.

The above hourly allowable VOC emission limitation was established based on the following equation:

HER = [Su * VC]

Where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;

Su = the maximum potential solvent usage rate, in gallons/hr; and

VC = the maximum solvent VOC content, in pounds per gallon

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

29.2 tons VOC per rolling, 12-month summation, from the use of coatings.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

d. Emission Limitation:

9.98 tons OC per rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined through the record keeping requirements established in this permit.

e. Emission Limitation:

6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

13. K015, Plastic Coating Line

Operations, Property and/or Equipment Description:

Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-10278)	The VOC emissions from this emissions unit shall not exceed 3512 pounds per day. The particulate emissions (PE) from this emissions unit shall not exceed 7.46 pounds per hour nor 172 lbs PM/day. Emissions from natural gas combustion in the drying oven: 0.47 lb PM/hr, 2.04 TPY PM, 0.04 lb SO2/hr, 0.16 TPY SO2, 6.12 lbs NOx/hr, 26.8 TPY NOx, 5.14 lbs CO/hr, 22.51 TPY CO, and 0.67 lb TOC/hr, 2.95 TPY TOC.
b.	OAC rule 3745-31-05(D) (In order to minimize emissions)	The emissions from this emissions unit shall not exceed: 188 tons VOC per rolling, 12-month summation of the monthly emissions; and/or 8.64 tons of PM per rolling 12-month summation of the emissions.
c.	40 CFR 63 Subpart PPPP (Surface coating of Plastic Parts and Products)	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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		facility and determined under 40 CFR 63.4481.
d.	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)(3)	See Section b)(2)c., below.

(2) Additional Terms and Conditions

a. The above pound per hour and pound per day limitations are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

b. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan. 1, 1990.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c) Operational Restrictions

(1) The maximum material usage for this emissions unit shall not cause VOC emissions to exceed 188 tons per rolling 12-month period, calculated according to the following formula:

AER = {[(C1 x VOCc1) + (C2 x VOCc2) + etc...] + [(S1 x VOCs1) + (S2 x VOCs2) + etc...]} / 2000 lbs/ton} - (R / 2000lbs/ton)

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

S = usage of purge and cleanup solvent j, in gallons;

VOCc = organic compound content of the coatings, in pounds per gallon;

VOCs = organic compound content of the solvents, in pounds per gallon;

R = amount of VOC recovered in the purge system, in pounds; and1,2, etc.. = individual coating, solvent, and specific VOC content for each coating or solvent.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

(2) The maximum material usage for this emissions unit shall not cause PM emissions to exceed 8.64 tons per rolling 12-month period, calculated according to the following formula:

AER = ({[(C1 x D1 x S%1) + (C2 x D2 x S%2) + etc...] x (1-TE)} x (1-RE)) / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

D = density of coating, in pounds per gallons;

S% = non-volatile percentage (solids) of coating i, in percent by weight;

TE = transfer efficiency of the coating onto the substrate (%);

RE = particulate removal efficiency of the underbooth waterwash system (%); and

1,2, etc.. = individual coating, density, and specific OC content for each coating.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

(3) In accordance with 40 CFR Part 63, Subpart PPPP, the permittee shall employ material compliant with the HAP emissions limitations as outlined in 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.

[Authority for term 40 CFR 63, Subpart PPPP, 3745-77-07(A)(1), PTI 05-10278]

(4) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

(5) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the purpose of determining the annual particulate matter emissions, based upon a 12-month summation of the monthly emissions:

a. the company identification for each coating employed;

b. the number of gallons of each coating employed;

c. the density of each coating, in pounds per gallon;

d. the non-volatile percentage (solids) of each coating, in percent by weight; and

e. the rolling, 12-month summation of the total PM emissions, according to the formula in c)(2).

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

(2) The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:

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

b. the number of gallons of each coating and cleanup material employed;

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

d. the rolling, 12-month summation of the total controlled VOC emissions, according to the formula in c)(1).

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

(3) 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 limitations 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

[Authority for term 40 CFR 63 Subpart PPPP, 3745-77-07(A)(3), PTI 05-10278]

(4) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

(5) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. the VOC emissions exceed 188 tons per rolling 12-month period;

b. the particulate emissions exceed 8.64 tons per rolling 12-month period;

c. 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;

d. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings; and/or

e. all instances when a fuel other than natural gas was burned in this emissions unit.

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

[Authority for term 40 CFR 63 Subpart PPPP, 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C)]

(2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

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:

188 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping requirements established in this permit.

b. Emission Limitation:

Emissions of PM from this emission unit shall not exceed 8.64 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping requirements established in this permit.

c. Emission Limitation:

7.46 pounds of PE per hour; and

172 pounds of PE per day, from overspray.

The above limitations are based on the following equations:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

DER = HER x 24

Where:

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

DER = Daily Emission Rate, in pounds of PE per day;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance will be assumed based on the record keeping requirements established in this permit.

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.

d. Emission Limitation:

3512 lbs VOC/day

The above limitations are based on the following equations:

DER = ({[(C1 x VOCc1) + (C2 x VOCc2) + etc...] + [(S1 x VOCs1) + (S2 x VOCs2) + etc...]} - (R)) x 24

Where:

DER = Daily Emission Rate, in pounds;

C = usage of coating, in gallons per hour;

S = usage of purge and cleanup solvent, in gallons per hour;

VOCc = organic compound content of the coatings, in pounds per gallon;

VOCs = organic compound content of the solvents, in pounds per gallon;

R = amount of VOC recovered in the purge system, in pounds; and1,2, etc.. = individual coating, solvent, and specific VOC content for each coating or solvent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:

0.47 lb PM/hr, 2.04 TPY PM,

0.04 lb SO2/hr, 0.16 TPY SO2,

6.12 lbs NOx/hr, 26.8 TPY NOx,

5.14 lbs CO/hr, 22.51 TPY CO, and

0.67 lb TOC/hr, 2.95 TPY TOC.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (61,200 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10

f. 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 PPPP, 63.4540 through 63.4568 or the applicable requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

[Authority for term 3745-77-07(C), PTI 05-10278]

g) Miscellaneous Requirements

(1) None.

14. K024, Spray Melt Sheet Operation

Operations, Property and/or Equipment Description:

Liquid applied sound deadener operation

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-12466)	Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour See Sections b)(2)a., c)(1), (2), (5), and (6), d)(1), (3) thru (7), e)(1), f)(1)a., and f)2), below.
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 28.7 tons as a rolling, 12-month summation. See sections c)(3), d)(2), and e)(1), below.
c.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents. See sections c)(4), d)(2), e)(1), and f)(1)b., below.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)b., below.
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections b)(2)c., c)(4), d)(1), (2), and e)(1), below.

(2) Additional Terms and Conditions

a. The emission limitations for pounds of VOC emissions per hour, 24.7, are established to reflect the potential to emit for this emissions unit. Therefore, it is

not necessary to require record keeping and reporting requirements to ensure compliance with this limit.

[Authority for term 3745-77-07(A)(1), PTI 05-124668]

b. OAC rule 3745-17-11(A)(1)(j) exemption for surface coating processed (eg. Sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) applicable methods. This source meets this exemption therefore 17-11(C) does not apply.

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

[Authority for term 40 CFR 64, 3745-77-07(A)(1), PTI 05-124668]

c) Operational Restrictions

(1) The permittee shall employ a thermal incinerator while the oven associated with this emissions unit is processing units. The thermal incinerator shall have a destruction removal efficiency of at least 90%.

The VOC capture efficiency is conservatively assumed to be 95 percent. The capture efficiency assumption is based upon supplier information and the low vapor pressure of the solvents in the coating, as applied. The percent capture efficiency shall be adjusted if monitoring or testing provides a more accurate estimate for this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-124668]

(2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time while the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated compliance.

[Authority for term 3745-77-07(A)(1), PTI 05-124668]

(3) The maximum combined material usage for this emissions unit shall not cause VOC emissions to exceed 28.7 tons of VOC per rolling 12 months, calculated using the following formula:

AER = [({[(C1 x OCc1) + (C2 x OCc2) + etc...] x Ce} x (1 - De)) + {[(C1 x OCc1) + (C2 x OCc2) + etc...] x (1-Ce)}] / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

OCc = organic compound content of the coatings, in pounds per gallon;

Ce= capture efficiency, assumed to be 95% (based on best available information from Honda to date);

DE = destruction removal efficiency of the thermal incinerator1,2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

[Authority for term 3745-77-07(A)(1), PTI 05-124668]

(4) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

[Authority for term 3745-77-07(A)(1), PTI 05-124668]

d) Monitoring and/or Recordkeeping Requirements

(1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and

b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

[Authority for term 3745-77-07(A)(3), PTI 05-124668]

(2) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance

indicators for VOC emissions include combustion temperature for destruction and air pressure changes within the oven exhaust/thermal incinerator inlet for capture.

The combustion temperature indicator range for the thermal incinerator shall be all three hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance.

The air pressure change at the oven exhaust/thermal incinerator inlet is monitored by a(n) air pressure switch(s) that indicates if the oven exhaust system is operational. The pressure/vacuum across the switch drops if the oven exhaust system fails to operate. A lockout system is installed to prevent the oven associated with the emission unit from processing units when the oven exhaust system is off. If the oven exhaust system is equipped with a redundant pressure/vacuum switch, it shall not be considered a deviation to replace a failed switch while the oven associated with the emission unit continues to process units as long as the redundant switch is operational.

If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[Authority for term 40 CFR 64, 3745-77-07(A)(3), PTI 05-124668]

(3) The permittee shall collect and record the following information each month:

a. the name and identification of each coating employed;

b. the volume, in gallons, of each coating employed;

c. the VOC content of each coating employed, excluding water and exempt solvents; and

d. the rolling, 12-month summation of the total VOC emissions, according to the formula in c)(3).

[Authority for term 3745-77-07(A)(3), PTI 05-124668]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. VOC emissions exceed 28.7 tons as a rolling, 12-month summation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above; and

c. all downtime of the capture (collection) system, control device, and monitoring equipment, when the oven associated with the emissions unit was processing units.

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

[Authority for term 40 CFR 64, 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C), PTI 05-124668]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.0 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term 3745-77-07(A)(3), PTI 05-124668]

f) Testing Requirements

(1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission limitation:

Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour.

The above limitation is based on the following equation:

HER = {[(Cu x VC) x Ce] x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

u = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

C = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

Compliance is based on the assumption that the above data represents the maximum production rate, minimal capture efficiency, and minimal destruction efficiency of these emissions unit, its ventilation system, and control device. Any changes in these assumptions may trigger additional air pollution permit review.

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Based upon the analytical test results of the deadner and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 95%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

b. Emissions Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings employed.

c. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 28.7 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping established in this permit.

[Authority for term 3745-77-07(C), PTI 05-124668]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office. The date of the last stack test for this emissions unit was performed on 8/18/09.

b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.

c. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-124668]

g) Miscellaneous Requirements

(1) None.

15. P004, Surfacer Sanding

Operations, Property and/or Equipment Description:

Surfacer Sanding

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.	OAC rule 3745-31-05(A)(3) (PTI 05-07923)	Use of fabric filters to minimize and/or eliminate particulate emissions (PE). Particulate (PE) emissions shall not exceed 0.88 lbs/hr nor 1.33 tons per rolling. See sections c)(2), d)(3), and f)(1)a., below.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements).	See sections b)(2)a., c)(1), d)(1), d)(2), e)(1), and f)(1)b., below.
c.	OAC rule 3745-17-07(A)	See section b)(2)a., below.
d.	OAC rule 3745-17-11	See section b)(2)b., below.

(2) Additional Terms and Conditions

a. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

c) Operational Restrictions

(1) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The permittee shall operate the filter system for the control of particulate emissions whenever this emissions unit is in operation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed;

b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months); and

c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units processed ("b") and the formula provided in section f)(1)a., below.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain records that document any time periods when the particulate control system was not in service when the emissions unit was in operation.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances when the total product exceeds 31,000 units per month;

b. all instances when the total product exceeds 267,000 units per rolling, 12-month; and

c. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

This deviation report shall be submitted according to the specific requirements of this permit.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Particulate (PE) emissions of 0.88 lbs/hr, and 1.33 tons per rolling.

The above allowable were determined based on the following equation(s) and information:

HER = [Sum of all coatings sanded (Sv x Sd x Us)] x (1-Oc%)

AER = [Sum of all coatings sanded(Sv x Sd x Us)] x (1-Oc%)

Where:

HER = the maximum PE Hourly Emission Rate , in lbs/hr;

AER = Annual Emission Rate, in tons/yr;

Sv = the sand volume produced, cubic feet per unit, (0.000215 cubic feet/unit, EDP, and 0.000268 cubic feet/hr, Primer);

Sd = density of sand, lbs/cubic ft, (84.29 lbs/cubic feet, EDP, and 118.56 lbs/ cubic feet, primer);

Us = Number of units sanded, (88 units/hr and 267,000 units/yr); and

Oc% = Estimated Overall Capture and Control Efficiency, (assumed 80%).

Applicable Compliance Method:

Compliance with the annual allowable PE emission limitations shall be determined through the record keeping requirements established in this permit.

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.

* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions unit, sanding data, and solids density the potential uncontrolled emissions will be 6.66 tons of PE per year.

b. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.

16. P021, Plastic Parts Painting Miscellaneous Solvent Usage

Operations, Property and/or Equipment Description:

Miscellaneous solvent cleaning and solvent wiping of plastic parts. Solvent-moistened Rags; Used Rag Containers.

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) b)(1)e., d)(3), (4), and (5), below.

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-10278)	Emissions of volatile organic compounds shall not exceed 970.8 lbs VOC/day. See section b)(2).a., below
b.	OAC rule 3745-31-05(D)	12.85 tons VOC per rolling, 12-month summation of the monthly emissions. See sections c)(1), d)(1), e)(1), and f)(1), below.
c.	40 CFR Part 63, Subpart PPPP	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP. See sections c)(3), d)(3), and e)(3), below.
d.	OAC rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

a. The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

c) Operational Restrictions

(1) The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed 12.85 tons per rolling 12-month period, calculated according to the following formula:

[Sum of all (S) x (VOC)]/2000

Where:

S = usage of solvent material i, in gallons; and

VOC = volatile organic compound content of material, in pounds per gallon.

[Authority for term 3745-77-07(A)(1), PTI 05-10278]

(2) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in 63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

[Authority for term 40 CFR 63, Subpart PPPP, 3745-77-07(A)(1), PTI 05-10278]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:

a. The company identification for each coating and cleanup material employed.

b. The number of gallons of each coating and cleanup material employed.

c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.

d. The rolling, 12-monthly summation of the total VOC emissions, according to the formula in section c)(1), above.

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

(2) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in 63.4530 of that subpart in the manner detailed in 63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

[Authority for term 40 CFR 63 Subpart PPPP, 3745-77-07(A)(3), PTI 05-10278]

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

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1 Hour Maximum Ground Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745 31 01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of

the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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

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

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

This deviation report shall be submitted according to the specific requirements of this permit.

[Authority for term 3745-77-07(A)(3), PTI 05-10278]

(2) As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in 63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

[Authority for term 40 CFR 63 Subpart PPPP, 3745-77-07(A)(3), PTI 05-10278]

f) Testing Requirements

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

a. Emission Limitation:

12.85 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping established in this permit.

b. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP 63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in 63.4540 through 63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

[Authority for term 3745-77-07(C), PTI 05-10278]

g) Miscellaneous Requirements

(1) None.

17. Emissions Unit Group - Hot Water Boilers: B004, B005, B006,

EU ID	Operations, Property and/or Equipment Description
B004	Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler
B005	Natural gas/No.2 oil-fired 16.875 MMBTU/hr hot water boiler
B006	Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.	OAC rule 3745-31-05(A)(3)(PTI # 05-03835)	Emissions from this emissions unit shall not exceed: 0.60 ton particulate emissions (PE) per year 5.54 tons nitrogen oxides (NOx) per year 4.65 tons carbon monoxide (CO) per year. See Sections c)(1), c)(2), c)(3)b., d)(1), d)(2), d)(3)b., e)(1), f)(1)d., thru f)(1)g., below.
b.	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-03835]

(2) The combined number 2 fuel oil usage in emissions units B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.

[Authority for term 3745-77-07(A)(1), PTI 05-03835]

(3) The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:

a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and

b. sulfur content of 0.5%.

[Authority for term 3745-77-07(A)(1), PTI 05-03835]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI 05-03835]

(2) The permittee shall maintain monthly records of the following information for this emissions units:

a. the amount of No. 2 fuel oil consumed, in gallons;

b. the amount of natural gas consumed, in million cubic feet;

c. the PE rate, in tons, calculated as follows:

i. for natural gas consumption, multiply by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98);

iii. sum “i” + “ii”, and then divide by 2000; and

iv. the total amount of PE tons the previous 12 month period.

d. the NOx emission rate, in tons, calculated as follows:

i. for natural gas consumption, multiply by the emission factor of 100 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply by the emission factor of 20 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum “i” + ”ii”, and then divide by 2000. and

iv. the total amount of NOx tons the previous 12 month period.

e. the CO emission rate, in tons, calculated as follows:

i. for natural gas consumption, multiply by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum “i” + “ii”, and then divide by 2000 and

iv. the total amount of CO tons the previous 12 month period.

[Authority for term 3745-77-07(A)(3), PTI 05-03835]

(3) Based on the oil analyses required in sections c) of this permit, the permittee shall maintain records on:

a. the calculated sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).); and

b. the sulfur content in percent.

[Authority for term 3745-77-07(A)(3), PTI 05-03835]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all instances where the PE emissions exceeded 0.60 tons per year, on a rolling monthly average;

b. all instances where the NOx emissions exceeded 5.54 tons per year, on a rolling monthly average;

c. all instances where the CO emissions exceeded 4.65 tons per year, on a rolling monthly average;

d. all instances in which number 2 fuel oil with greater than 1.6 lbs of SO2/mmBTU of actual heat input is employed; and

e. all instances in which fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), PTI 05-03835]

(2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-3835: d)(1) thru (3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term 3745-77-07(A)(3), PTI 05-03835]

f) Testing Requirements

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

a. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent 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 OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

1.6 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping established in this permit.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO2 emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

d. Emission Limitation:

0.60 TPY of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in this permit and shall be the summation of the 12 calendar month PE rates.

e. Emission Limitation:

5.54 TPY of NOx

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in this permit and shall be the summation of the 12 calendar month NOx emission rates.

f. Emission Limitation:

4.65 TPY of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in this permit and shall be the summation of the 12 calendar month CO emission rates.

g. Emission Limitation:

0.5 % sulfur content in number 2 fuel oil employed.

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping established in this permit.

[Authority for term 3745-77-07(C), PTI 05-03835]

g) Miscellaneous Requirements

(1) None.

18. Emissions Unit Group - Injection Mold Machines: P025, P026, P027,

EU ID	Operations, Property and/or Equipment Description
P025	Injection Molding Machine
P026	Injection Molding Machine
P027	Injection Molding machine

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) b)(1)d., d)(3), thru (6) and e)(3), below.

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-14163)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.
b.	OAC rule 3745-31-05(D)	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined. VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.
c.	OAC rule 3745-114-01	Ohio Toxic Rule See section d)(3), thru (6) and e)(3), below.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

[Authority for term 3745-77-07(A)(1),PTI 05-14163]

c) Operational Restrictions

(1) The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

AER = [(M1 x VOCm1) + (M2 x VOCm2) + etc...] / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

M = usage of mold agent or cleaning solvent, in gallons;

VOCm = Volatile organic compound content of material, in pounds VOC per gallon; and

1,2, etc.. = individual materials employed and the specific VOC content for each material employed.

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

[Authority for term 3745-77-07(A)(1), PTI 05-14163]

(2) The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

AER = (P x EF) / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

P = usage of plastic pellets employed, in pounds; and

EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

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

[Authority for term 3745-77-07(A)(1), PTI 05-14163]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

a. the company name and identification for each liquid organic material employed; and

b. whether or not each liquid organic material employed is a photochemically reactive material.

[Authority for term 3745-77-07(A)(3), PTI 05-14163]

(2) The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:

a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;

b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;

c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;

d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in c)(1). of this permit;

e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;

f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and

g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

[Authority for term 3745-77-07(A)(3), PTI 05-14163]

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

Pollutant: Isopropanol

TLV (ug/m3): 491,500

Maximum Hourly Emission Rate (lbs/hr): 13.24

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 944.5

MAGLC (ug/m3): 11,702

[Authority for term 3745-77-07(A)(3), 3745-114-01, PTI 05-14163]

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

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a modification under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute:", ORC 3704.03(F):

[Authority for term 3745-77-07(A)(3), 3745-114-01, PTI 05-14163]

(5) 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.

[Authority for term 3745-77-07(A)(3), 3745-114-01, ORC 3704.03(F)(3)(c) and F(4), Option A, Engineering Guide #70, PTI 05-14163]

e) Reporting Requirements

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

a. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined; and

b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These deviation reports shall be submitted in accordance with the specific requirements of this permit.

[Authority for term 3745-77-07(A)(3), 3745-114-01, PTI 05-14163]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

HER = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)

Where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MPv = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WSv = the VOC content of the wiping solvent, lbs VOC/gal

* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), 3745-114-01, PTI 05-14163]

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

[Authority for term 3745-77-07(C), 3745-114-01, PTI 05-14163]

g) Miscellaneous Requirements

(1) None.

19. Emissions Unit Group - Topcoat Lines: K005, K006,

EU ID	Operations, Property and/or Equipment Description
K005	Topcoat Line A
K006	Topcoat Line B

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.	OAC rule 3745-31-05(A)(3) and (PTI 05-07923)	Hourly emissions from the coating operation shall not exceed: 214.64 lbs VOC; and 10.8 lbs of particulate emissions (PE), from overspray. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.26 lb PM10/hr; 0.031 lb SO2/hr; 5.13 lbs NOx/hr; 4.31 lbs CO/hr; and 0.27 lb VOC/hr.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements).	Sections b)(2)a. and b., c)(2), d)(1) and (5), e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2)g., below.
e.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
g.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
h.	OAC rule 3745-17-10(B)(from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-17-07(A)(from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
j.	40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
k.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections d)(5) and e)(1), below..

(2) Additional Terms and Conditions

a. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c. The 214.64 lbs VOC per hour limitation was 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.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

e. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

f. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan. 1, 1990.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

h. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(2) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(3) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(4) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

[Authority for term 3745-77-07(A)(1), PTI 05-07923]

(5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

[Authority for term 40 CFR 63.3093 through 63.3101, 3745-77-07(A)(1), PTI 05-07923]

(6) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

[Authority for term 40 CFR 64, 3745-77-07(A)(1), PTI 05-07923]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

a. the name and identification number of each topcoat employed;

b. the number of gallons employed of each coating;

c. the VOC content, in pounds of VOC per gallon;

d. the VOC content, in pounds per gallon, excluding water and exempt solvents;

e. the water and exempt solvent content, in percent by volume;

f. the nonvolatile (solids) content, in percent by volume;

g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and

i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

[Authority for term 40 CFR 60 Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and

f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(4) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and

b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

[Authority for term 40 CFR 60 Subpart MM, 3745-77-07(A)(3), PTI 05-07923]

(5) The CAM plan for this emissions unit has been developed for VOC emissions through parametric monitoring of the capture and control system. The CAM performance

indicators for VOC emissions include combustion temperature for destruction and air pressure changes within the oven exhaust/thermal incinerator inlet for capture.

The combustion temperature indicator range for the thermal incinerator shall be all three hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission tests that demonstrated this emissions unit was in compliance.

The air pressure change at the oven exhaust/thermal incinerator inlet is monitored by a(n) air pressure switch(s) that indicates if the oven exhaust system is operational. The pressure/vacuum across the switch drops if the oven exhaust system fails to operate. A lockout system is installed to prevent the oven associated with the emission unit from processing units when the oven exhaust system is off. If the oven exhaust system is equipped with a redundant pressure/vacuum switch, it shall not be considered a deviation to replace a failed switch while the oven associated with the emission unit continues to process units as long as the redundant switch is operational.

If the required monitoring demonstrates an excursion from the indicator ranges, then the permittee shall take corrective actions to restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions..

[Authority for term 40 CFR 64, 3745-77-07(A)(3), PTI 05-07923]

(6) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;

a. the number of units processed; and

b. the rolling, 12-month total number of units processed, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(7) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(8) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;

b. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period;

c. all instances when the total product exceeds 31,000 units per month;

d. all instances when the total product exceeds 267,000 units per rolling, 12-month;

e. all instances when a fuel other than natural gas was burned in this emissions unit;

f. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings;

g. 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; and

h. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

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

[Authority for term 3745-77-07(A)(3), 3745-15-03(B)(1)(a), 3745-15-03(C) 3745-77-07(A)(3), PTI 05-07923]

(2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or

b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

[Authority for term 3745-77-07(A)(3), PTI 05-07923]

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

[Authority for term 40 CFR 63.3110 through 63.3176, 3745-77-07(A)(3), PTI 05-07923]

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 methods:

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

0.26 lb PM10/hr;

0.031 lb SO2/hr;

5.13 lbs NOx/hr;

4.31 lbs CO/hr; and

0.27 lb VOC/hr.

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,3000 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit..

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

e. Emission limitation:

214.64 lbs VOC per hour

The above limitation was established based on the following equation:

HER = {[(Cu x VC) x Ce] x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

If required, compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping established in this permit.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

[Authority for term 3745-77-07(C), PTI 05-07923]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA. The date of the last stack test for this emissions unit was performed on 8/12/09 and 8/13/09.

b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

(3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

[Authority for term 3745-77-07(C), PTI 05-07923]

g) Miscellaneous Requirements

(1) None.