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

5/14/2012

Certified Mail

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

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0546000117
Permit Number: P0109704
Permit Type: OAC Chapter 3745-31 Modification
County: Logan

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

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

Sincerely,

Michael W. Ahern

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

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

Ohio | Environmental Protection Agency

FINAL

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

Facility ID:	0546000117
Permit Number:	P0109704
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/14/2012
Effective:	5/14/2012

Ohio Environmental Protection Agency

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

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Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0043369
Permit Number: P0109704
Permit Description: K003 is currently part of 05-07923. Source is being modified to increase combustion emissions from ASU's, Oven burner's and Thermal Oxidizer. The short term and long term emission limits related to the coating activities are not changing.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00
Issue Date: 5/14/2012
Effective Date: 5/14/2012

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109704
Permit Description: K003 is currently part of 05-07923. Source is being modified to increase combustion emissions from ASU's, Oven burner's and Thermal Oxidizer. The short term and long term emission limits related to the coating activities are not changing.

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

Emissions Unit ID:	**K003**
Company Equipment ID:	Guidecoat Line
Superseded Permit Number:	05-07923
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

3. General Requirements

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

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

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

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. K003, Guidecoat Line

Operations, Property and/or Equipment Description:

Guidecoat 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 operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	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. Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule. Emissions from all natural gas combustion associated with this emission unit (includes drying ovens, air supply houses, and incinerator): 0.14 lb PM10/hr; 4.48 lbsNOx/hr; 6.26 lbs CO/hr; and 0.41 lb VOC/hr.

b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions from natural gas combustion associated with this emissions unit (includes drying ovens, air supply houses, and incinerator): 0.04 lb SO2/hr. See section b)(2)e., below.
c.	OAC paragraph 3745-31-05(A)(3)(b)(ii), as effective 12/01/06	See section b)(2)f., below.
d.	OAC rule 3745-31-05(D) (Synthetic Minor for VOC emissions to avoid PSD requirements.)	See Sections b)(2)a. and b., c)(2), d)(2), (3), e)(1), f)(1)b., and c., below.
e.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	The visible emission limit specified by this rule is equivalent to the VE limitation established pursuant to ORC 3704.03(T)
f.	OAC rule 3745-17-11(C)(3)	See Section b)(2)i., below.
g.	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).
h.	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).
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)g, below.
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)h, 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).
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.

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.

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.

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.

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

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide (SOx) emissions from this emissions unit since the “controlled” potential to emit is less than ten tons per year.

g. 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).

h. 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.

i. 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.

j. 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.

k. Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity for the source remains below 74.5 MMBTU/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a and b)(1)b. of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

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.

(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.

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

(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 coating.

(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]

(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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units. 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]

(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 [Coating Usage (gal) * VOC content (lb/gal) * (1 - oven capture * incinerator efficiency)];

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).

(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).

(4) 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, 3745-21-09 (C)(4)]

(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).

(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 3745-17-11(C)(3),]

(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.

(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 Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

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.

(2) [OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] 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.

(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.

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

Applicable Compliance Method:

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).

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:

0.14 lb PM10/hr;

0.04 lb SO2/hr;

4.48 lbsNOx/hr;

6.26 lbs CO/hr; and

0.41 lb VOC/hr

The above allowable were determined based on the following information:

The hourly allowable emission limitations for PM10/PM, SO2, CO and VOC were established by multiplying the maximum natural gas usage rate (74,500 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

The hourly allowable emission limitation for NOx was established based on the summation of the following:

multiplying the maximum gas usage rate for uncontrolled burners (15,000 cu ft/hr) by the emission factor for uncontrolled NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

multiplying the maximum gas usage rate to low-NOx burners (59,500 cu ft/hr) by the emission factor for low-NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NOx: 100 lbsNOx/mm cu. ft.; for low-NOx: 50 lbsNOx/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.

(2) If required, 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 12 months following installation of replacement incinerator to demonstrate compliance with the 90% destruction efficiency requirement. The permittee shall also determine the VOC capture efficiency for this emissions unit as specified in section f)(2)(b) of this permit and accordance with OAC rule 3745-21-09(C)(4).

b. 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.

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 the Ohio EPA, Southwest District Office.

(3) 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.

(4) 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.

g) Miscellaneous Requirements

(1) None.