



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/20/2012

Certified Mail

Mr. Jeff Waid
Honda of America Mfg., Inc. - Honda "S" Line
24000 Honda Parkway
Marysville, OH 43040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010413
Permit Number: P0109869
Permit Type: Initial Installation
County: Union

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Marysville Tribune. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: On April 9, 2012, Honda of America (Honda) submitted an application for the initial installation of a new low volume, specialty automobile plant (NSX) to be located in an existing building on their Marysville Automobile Plant (MAP) Property. This plant will manufacture a maximum of 30 vehicles per day and no more than 5000 vehicles per rolling 12-month period (synthetic minor limitation to avoid New Source Review (NSR)/Prevention of Significant Deterioration (PSD)). On June 29, 2012, a corrected application was also submitted to add an E-Coat Line to the project. A carbon adsorber installed on two sources, Body Coating and E-Coat, to control volatile organic compound (VOC) emissions will also ensure that emissions remain below NSR/PSD levels. The emission sources applied for include the following:

K001 – Assembly Operations: This includes a Window Install Operation for the installation of main glass and quarter glass, a door sealer application operation, and a miscellaneous parts adhesive operation. All applied coatings are air dried. There are no particulate emissions associated with this emissions unit as coatings are applied using a brush applicator or a robotic airless applicator.

K001 is part of the synthetic minor limitation that limits emission units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. An operational restriction of vehicle production across all these sources is included to ensure compliance with this limit; however, K001 is the only emission source that has a higher vehicle production operational restriction than the other sources listed on the permit under this limitation. The operational restriction of 8000 vehicles per rolling 12-month period for assembly not only includes the 5000 vehicle production limit for NSX, but also includes an additional 3000 vehicles with special power trains which will be welded and coated at another facility and then transferred to NSX to be assembled by their specialized assembly personnel at this plant.

K002 – Frame Coating Line: Automobile frames are sent through an application area where sealer and deadener are applied and then through a booth where blackout is applied. There are no particulate emissions associated with this emissions unit as coatings are applied using an airless applicator and bead extrusion. All applied coatings are dried in the bake oven.

K002 is part of the synthetic minor limitation that limits emissions units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. K002 is restricted to a production rate of 5000 vehicles per rolling 12-month period to ensure compliance with this limit. In addition, K002 is part of two group limits included in the permit under BAT: a purge and cleaning solvent limit of 10.84 tons per rolling 12-month period and a natural gas group limitation of less than 56.0 million Btu per hour (MMBtu/hr). See discussion below for these group limits.

K003 – Body Coating Line: The Body Coating Line includes a primer/basecoat booth with associated manual spray area and air supply units, a flash tunnel, a clearcoat booth with associated manual spray area and air supply units, and a bake oven. Because the facility employs E-Coat, the primer/basecoat booth is regulated as a guidecoat/surfacers under OAC 3745-21-09 and the clearcoat booth is referred



to as the topcoat. The guidecoat/surfacers operation, regulated under 3745-21-09 (C)(1)(a)(v), and the topcoat operation, regulated under 3745-21-09 (C)(1)(c), are each limited to 2.8 lbs VOC/gal of coating, excluding water and exempt solvents, or 15.1 lbs VOC/gal of deposited solids, as a daily volume weighted average. The facility will employ a carbon adsorber with a collection efficiency of 95% to control VOC emissions from the primer/basecoat booth and clearcoat booth (no oven control). The permit includes a requirement to perform source testing for both adsorber capture and control efficiency.

K003 is part of the synthetic minor limitation that limits emissions units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. K003 is restricted to a production rate of 5000 vehicles per rolling 12-month period to ensure compliance with this limit. In addition, K003 is part of two group limits included in the permit under BAT: a purge and cleaning solvent limit of 10.84 tons per rolling 12-month period and a natural gas group limitation of less than 56.0 MMBtu/hr. See discussion below for these group limits.

K004 – Final Repair/Polish: For final repair, Honda confirmed that all spray guns used in Final Repair will be cup guns; therefore, 3745-17-11 does not apply per 3745-17-11(A)(1)(k) which states that the rule is not applicable to surface coating processes that employ hand-held cup spray guns.

K004 is part of the synthetic minor limitation that limits emissions units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. K004 is restricted to a production rate of 5000 vehicles per rolling 12-month period to ensure compliance with this limit. In addition, K004 is part of a group limit included in the permit under BAT: a purge and cleaning solvent limit of 10.84 tons per rolling 12-month period. See discussion below.

K005 – E-Coat Line: The E-Coat Line consists of a dip tank, rinse zones, and bake oven. The oven will be controlled by a carbon adsorber with a collection efficiency of 95% to control VOC emissions from the E-Coat oven. The permit includes a requirement to perform source testing for both adsorber capture and control efficiency.

K005 is part of the synthetic minor limitation that limits emissions units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. K005 is restricted to a production rate of 5000 vehicles per rolling 12-month period to ensure compliance with this limit. In addition, K005 is part of two group limits included in the permit under BAT: a purge and cleaning solvent limit of 10.84 tons per rolling 12-month period and a natural gas group limitation of less than 56.0 MMBtu/hr. See discussion below for these group limits.

P001 – Welding Operations: Weld Operations include spot and MIG welding operations, anti-spatter, solvent wiping, sealer and adhesive usage, and a natural gas fired bake oven.

P001 is part of the synthetic minor limitation that limits emissions units K001, K002, K003, K004, K005 and P001 to no more than 33.42 tons of VOC per rolling 12-month period to avoid NSR/PSD. In addition, P001 is part of a group limit included in the permit under BAT: a natural gas group limitation of less than 56.0 MMBtu/hr. See discussion below for this group limit.



P002 – Inspection and Repair Sanding: This includes repair sanding that occurs in a booth controlled with dry filters as well as miscellaneous inspection sanding that occurs outside the booth. Repair sanding is a very intermittent operation, and as such, in lieu of daily visible emissions checks, the permit contains terms and conditions requiring the use of a fabric filter in the booth for particulate control and records documenting any time periods when the fabric filter control was not in operation when repair operations were occurring in the booth. P002 is part of a group limit included in the permit under BAT: a natural gas group limitation of less than 56.0 MMBtu/hr. See discussion below for these group limits.

Purge and cleaning solvent group limit: Under BAT, emissions units K002, K003, K004, and K005, which share a common purge and clean-up line and recovery system, are limited to no more than 10.84 tons of VOC per rolling 12-month period. Because VOC emissions from purge and clean-up are greater than 10 tons per year, the reference to this limit is included under ORC 3704.03(T). The source potentials for K002, K004, and K005, although each by themselves under 10 tons per year, are also included under ORC 3704.03(T) because when combined with the purge and clean-up limit, the VOC total for each coating operation is above the 10 tons per year threshold. The permit includes terms and conditions under each of these sources to account for purge and clean-up recovery for BAT emissions tracking and synthetic minor tracking purposes.

Natural gas group limit: Under BAT, emissions units K002, K003, K005, P001, and P002 are limited to no more than 56.0 million Btu per hour heat input. A condition under each of these emission units states that additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification as long as the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 MMBtu/hr. Nitrogen oxide (NO_x) and carbon monoxide (CO) emissions are greater than 10 tons per year; therefore are listed under ORC 3704.03(T) while particulate emissions (PE), sulfur dioxide (SO₂) and VOC are all less than 10 tons per year and are listed under 3745-31-05(A)(3)

3. Facility Emissions and Attainment Status: Although emissions from this new plant by itself are less than major source thresholds for both Title V and NSR/PSD, the facility is considered one facility with the overall Honda facility at MAP and East Liberty Plant (ELP). The existing MAP/ELP facility is major for both Title V and NSR/PSD; therefore, this plant is subject to Title V and will need to submit a Title V application within one year of permit issuance. In addition, this project is subject to the PSD significance levels and the facility has taken a production limitation of 5000 vehicles per rolling 12-month period to reduce VOC emissions below the 40 ton per year significance level for VOC. Union County is currently in attainment for all pollutants with the exception of PM_{2.5}.
4. Source Emissions: Emissions in the table below are source allowable emissions taking into account the synthetic minor limitation of 5000 vehicles per rolling 12-month period included in the permit.

ID No.	Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
K001	Assembly	--	--	--	--	--	2.61	--
K002	Frame Coating	0.01	0.01	--	--	--	2.18	--
K003	Body Coating	1.05	1.05	0.72	--	--	10.95	--
K004	Final Repair	0.11	0.11	0.07	--	--	0.41	--
K005	E-Coat	--	--	--	--	--	1.32	--
P001	Weld	0.50	0.50	0.50	--	--	3.76	--
P002	Inspection/Repair Sanding	0.50	0.40	0.23	--	--	--	--
K002 K003 K004 K005	Purge/Cleanup (combined)	--	--	--	--	--	10.84	--



K002 K003 K005 P001 P002	Natural Gas Combustion (< 56 MMBTU total combined)	1.86	1.86	1.86	0.15	24.53	1.35	20.60
	Permitted Total	4.03	3.93	3.38	0.15	24.53	33.42	20.60
	Gasoline Dispensing	--	--	--	--	--	0.04	--
	Dynamometer	0.01	0.01	0.01	--	0.02	0.01	0.30
	Emergency Generator	0.03	0.03	0.03	0.03	0.39	0.03	0.08
	Injection Molding @ MAP	--	--	--	--	--	0.04	--
NSX Plant & S u p p o r t i n g	Project Total	4.07	3.96	3.42	0.18	24.94	33.54	20.98
	NSR/PSD threshold	25	15	10	40	40	40	100

5. Please provide additional notes or comments as necessary:

NSPS Applicability – K003 and K005 are each subject to 40 CFR 60, Subpart MM “Standards of Performance for Automobiles and Light Duty Truck Surface Coating Operations.”

MACT Applicability – K001, K002, K003, K004, K005 and P001 are each subject to 40 CFR 63, Subpart IIII “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.” The facility is an existing affected source under the MACT and intends to use the cross-line averaging option to show compliance with the limitations. The MACT requirements were incorporated by reference into the Facility-Wide Terms and Conditions and under the terms and conditions for each subject emissions unit.

Air Toxics – Sources emitting toxic air pollutants at this facility are not subject to state air toxics due to the applicability of the MACT.

6. Conclusion: Issuance of PTI P0109869 is recommended.

PUBLIC NOTICE
7/20/2012 Issuance of Draft Air Pollution Permit-To-Install

Honda of America Mfg., Inc. - Honda "S" Line
25000 Honda Parkway,
Marysville, OH 43040
Union County

FACILITY DESC.: Automobile Manufacturing

PERMIT #: P0109869

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation of a small volume specialty automobile manufacturing plant. Allowable emissions of all criteria pollutants are below New Source Review significance levels with synthetic minor limitations.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kelly Saavedra, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

**Division of Air Pollution Control
Permit-to-Install**

for

Honda of America Mfg., Inc. - Honda "S" Line

Facility ID:	0180010413
Permit Number:	P0109869
Permit Type:	Initial Installation
Issued:	7/20/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc. - Honda "S" Line

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K001, Assembly Operations 14
2. K002, Frame Coating Line 22
3. K003, Body Coating Line 32
4. K004, Final Repair/Polish 49
5. K005, E-coat Line 59
6. P001, Weld Operations 75
7. P002, Inspection & Repair Sanding 83



Authorization

Facility ID: 0180010413
Facility Description:
Application Number(s): A0044226, A0045028
Permit Number: P0109869
Permit Description: Initial installation of a small volume specialty automobile manufacturing plant. Allowable emissions of all criteria pollutants are below New Source Review significance levels with synthetic minor limitations.
Permit Type: Initial Installation
Permit Fee: \$1,400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/20/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Honda of America Mfg., Inc. - Honda "S" Line
25000 Honda Parkway
Marysville, OH 43040

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0109869

Permit Description: Initial installation of a small volume specialty automobile manufacturing plant. Allowable emisissions of all criteria pollutants are below New Source Review significance levels with synthetic minor limitations.

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

- Emissions Unit ID: K001
Company Equipment ID: Assembly Operations
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: K002
Company Equipment ID: Frame Coating Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: K003
Company Equipment ID: Body Coating Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: K004
Company Equipment ID: Final Repair/Polish
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: K005
Company Equipment ID: E-coat Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P001
Company Equipment ID: Weld Operations
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P002
Company Equipment ID: Inspection & Repair Sanding
Superseded Permit Number:
General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central 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, Central 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, Central 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, Central 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, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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



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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The following emission units contained in this permit are subject to 40 CFR Part 60, Subpart MM: K003 and K005. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K001, K002, K003, K004, K005, and P001. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions



1. K001, Assembly Operations

Operations, Property and/or Equipment Description:

Assembly Operations (Window install operation using glass primer, body primer, and window adhesive; door sealer application; and miscellaneous parts application of adhesives, foams, solvents and lubricants)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)f., b)(2)d., c)(1), d)(2), d)(3), and e)(2).

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing specific rules and their corresponding emission control measures.



d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>The VOC content of each coating, with the exception of body primer, applied to metal in this emissions unit shall not exceed 3.5 pounds/gallon (lb/gal), excluding water and exempt solvents.</p> <p>The VOC content of each coating and solvent employed on non-metal substrates shall not exceed 6.75 lbs/gal.</p> <p>Total VOC emissions from all coatings, glass and body primers, adhesives, foams, solvents and lubricants employed shall not exceed 2.61 tons per year.</p> <p>The requirements established pursuant to this rule also include compliance with OAC rules 3745-21-09(U)(1)(d) and 3745-31-05(D).</p> <p>See b)(2)b.</p>
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
f.	OAC rule 3745-31-05(D) (Synthetic Minor To Avoid NSR)	See b)(2)d. and c)(1)
g.	40 CFR 63, Subpart IIII	See b)(2)e.
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

- a. The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

- c. BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b)(1)d.

- d. This rule 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).

- e. Total VOC emissions from emission units K001, K002, K003, K004, K005 and P001 shall not exceed 33.42 tons per rolling 12-month period.

- f. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.



- iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.
g. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) Emission unit K001 shall be limited to a production rate of 8000 units (vehicles) per rolling 12-month period, measured at the assembly off area (AF Off).

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Production Rate. Rows range from 1 to 1-12 months.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month:
a. The name and identification of each coating, glass and body primer, adhesive, foam, solvent and lubricant applied;

- b. The VOC content of each coating, glass and body primer, adhesive, foam, solvent and lubricant applied;
 - c. The number of gallons of each coating, glass and body primer, adhesive, foam, solvent and lubricant employed;
 - d. The total VOC emissions from all coatings, glass and body primers, adhesives, foams, solvents and lubricants employed, in pounds or tons, i.e., (b) x (c); and
 - e. The annual 12-month summation of VOC emissions from all coatings, glass and body primers, adhesives, foams, solvents and lubricants employed, in tons.
- (2) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005 and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d. under each of the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, to demonstrate compliance with the emission limitation found in the terms and conditions for K002, K003, K004, and K005 under Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month, i.e., (a) + (b) - (c);
 - f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and
 - g. the rolling, 12-month total VOC emissions from K001, K002, K003, K004, K005, and P001, i.e., (e) + the previous 11 month calculated VOC emissions from K001, K002, K003, K004, K005, and P001.



- (3) The permittee shall maintain monthly records of the following:
 - a. The production rate, in units (vehicles); and
 - b. The rolling, 12-month summation of production rate, in units (vehicles).
 - (4) The permittee shall collect and record the following information each day for body primer employed to metal components and/or parts:
 - a. The name and identification of each coating employed;
 - b. The total volume of each coating employed; and
 - c. The total volume, in gallons, of all coatings employed.
 - (5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (6) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- e) Reporting Requirements
- (1) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.5 lbs VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the rolling 12-month VOC emissions limitation specified in b)(2)d.; and
 - b. any exceedance of the rolling 12-month vehicle production limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (3) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.
 - (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.



- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

The VOC content of each coating, with the exception of body primer, shall not exceed 3.5 lb/gal, excluding water and exempt solvents.

The VOC content of each coating and solvent used on non-metal substrates shall not exceed 6.75 lbs/gal.

Applicable Compliance Method:

Compliance with the VOC content limits may be determined through monthly record keeping specified in Section (d)(1) above. Formulation data from the manufacturer of the coating or US EPA Method 24 shall be used to determine the VOC content.
 - b. Emissions Limitation:

VOC emissions shall not exceed 2.61 tons per year.

Applicable Compliance Method:

Compliance with this limit may be determined through the record keeping specified in Section d)(1) above.
 - c. Emissions Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005 and P001 shall not exceed 33.42 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(2). Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials.
 - d. Emissions Limitation:

The usage of body primer in the window install operation shall not exceed 10 gallons per day.



Applicable Compliance Method:

Compliance with this limit may be determined through the record keeping specified in Section d)(4) above.

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.



2. K002, Frame Coating Line

Operations, Property and/or Equipment Description:

Frame Coating Line including sealer and deadener application area, blackout coating booth with associated air supply units, and natural gas-fired bake oven.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
a. None.
(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
a. b)(1)f., b)(2)c., c)(1), d)(5), d)(6), and e)(1).
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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It details regulatory references like OAC rule 3745-17-11(A)(1)(i) and (j), OAC rule 3745-21-09(U)(1)(i), and ORC 3704.03(T) along with their respective emission control measures.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>20.60 tons of CO per rolling, 12-month period.</p> <p>Total VOC emissions from all sealers, deadeners and blackout coatings, employed shall not exceed 2.18 tons per rolling, 12-month period.</p> <p>See b)(2)d., b)(2)e., and b)(2)f.</p>
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>PE from coating overspray shall not exceed 0.01 lb/hr and 0.01 ton per year.</p> <p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>0.43 lb of PE/hr; 1.86 tons of PE/yr; 0.03 lb of SO₂/hr; 0.15 ton of SO₂/yr; 0.31 lb of VOC/hr; and 1.35 tons of VOC/yr.</p> <p>See b)(2)a., b)(2)e., and b)(2)f.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i) and 3745-31-05(D).</p>
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
f.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid NSR)	See b)(2)c. and c)(1)
g.	40 CFR 63, Subpart IIII	See b)(2)g.
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)h.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule

revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b)(1)d.

- b. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for SO₂ is less than 10 tons per yr.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the calculated annual emission rate for PE and VOC are each less than 10 tons per year taking into account the federally enforceable production limit under OAC rule 3745-31-05(D).

- c. Total VOC emissions from emission units K001, K002, K003, K004, K005 and P001 shall not exceed 33.42 tons per rolling 12-month period.
- d. Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.
- e. The hourly and annual natural gas emission limitations and hourly coating PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- f. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.
- g. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:
- i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations



plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

- ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.
iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.
iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.
h. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) Emission unit K002 shall be limited to a production rate of 5000 units (vehicles) per rolling 12-month period, measured in the paint department.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Production Rate. Rows include 1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, 1-8.



Table with 2 columns: ID (1-9 to 1-12) and Value (3751 to 5000)

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (2) The permittee shall burn only natural gas as fuel in this emissions unit.
(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect, record, and maintain the following information each month for the purpose of determining the contribution of sealers, deadeners and blackout coatings applied in emissions unit K002, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable VOC emission limitation (Section b)(2)c.):
a. the name and identification of each sealer, deadener and blackout coating employed;
b. the VOC content of each sealer, deadener and blackout coating employed;
c. the number of gallons of each sealer, deadener and blackout coating employed;
d. the total VOC emissions from all sealers, deadeners and blackout coatings employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all sealer, deadener and blackout coating applied in this emissions unit times each material's VOC content (b); and
e. the rolling, 12-month total VOC emissions from all sealers, deadeners and blackout coatings, excluding cleanup/purge, employed in emission unit K002, i.e., (d) + the previous 11 month calculated total VOC emissions from sealers, deadeners and blackout coatings employed in K002.
(2) VOC emissions from cleanup/purge material usage, associated with K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation under b)(2)d.

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (3) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K002, K003, K004, and K005:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied in emissions units K002, K003, K004, and K005, times each material's VOC content (b).
- (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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)d.):
- 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 cleanup and purge solvent employed in emissions units K002, K003, K004, and K005, represented in the applicable VOC emission limitation (Section b)(2)d.), i.e., (c) x (d).
- (5) In order to document the rolling, 12-month VOC emissions K001, K002, K003, K004, K005, and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d., in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(4)e.), to be credited to the

calculations of the VOC emissions, to demonstrate compliance with the emission limitation in Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;

- d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month, i.e., (a) + (b) - (c);
 - f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, , i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and
 - g. the rolling, 12-month total VOC emissions from K001, K002, K003, K004, K005, and P001, i.e., (e) + the previous 11 month calculated VOC emissions from K001, K002, K003, K004, K005, and P001.
- (6) The permittee shall maintain monthly records of the following:
- a. The production rate, in units (vehicles); and
 - b. The rolling, 12-month summation of production rate, in units (vehicles).
- (7) In order to demonstrate that a surface coating process uses less than five gallons of coating per day, the permittee shall collect and record the following information each day for the process:
- a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (9) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)c.; and

- b. any exceedance of the rolling, 12-month vehicle production limitation.
- (2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lbs VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
 - (3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
 - (4) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.
 - (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Emissions from natural gas from emissions units K002, K003, K005, P001 and P002 combined:

0.43 lb of PE/hr;
1.86 tons of PE/yr;
0.03 lb of SO₂/hr;
0.15 ton of SO₂/yr;
24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr;
1.35 tons of VOC/yr; and
20.60 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

0.01 lbs PE/hr and 0.01 tons per year from coating overspray

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

Where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

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

c. Emission Limitation:

VOC content from coatings shall not exceed 3.0 lbs VOC/gal excluding water and exempt solvents

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above. Formulation data from the manufacturer of the coating or US EPA Method 24 shall be used to determine the VOC content.

d. Emission Limitation:

Total VOC emissions from all sealers, deadeners and blackout coatings, employed shall not exceed 2.18 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above.

e. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content purge and cleanup materials.

f. Emissions Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and reducing solvents.

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

- (1) None.



3. K003, Body Coating Line

Operations, Property and/or Equipment Description:

Body Coating Line including a primer/basecoat booth with associated manual spray area and air supply units, flash tunnel, clearcoat booth with associated manual spray area and air supply units, and bake oven. Also includes repair coatings.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)g., b)(2)c, c)(4), d)(11), d)(12) and e)(2)b and c.

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-11(C), OAC rule 3745-21-09(C)(1)(a)(v), and OAC rule 3745-21-09(C)(1)(c).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	ORC 3704.03(T)	<p>VOC emissions from coatings, excluding cleanup and purge, shall not exceed 10.95 tons per rolling, 12-month period.</p> <p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period.</p> <p>See b)(2)b. and b)(2)k.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1)(a)(v), 3745-21-09(C)(1)(c), 3745-31-05(D), and 40 CFR Part 60, Subpart MM.</p> <p>See b)(2)d. through b)(2)h.</p>
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>PE from coating overspray shall not exceed 1.68 lbs/hr and 1.05 tons per year.</p> <p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>0.43 lb of PE/hr; 1.86 tons of PE/yr; 0.03 lb of SO₂/hr; 0.15 ton of SO₂/yr; and 1.35 tons of VOC/yr.</p> <p>See b)(2)b., b)(2)i., and b)(2)k.</p>
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)j.
g.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid NSR)	See b)(2)c. and b)(2)f. through b)(2)h.



h.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 kilograms per liter (kgs/liter) (11.68 lbs/gal) of applied coating solids, as a monthly volume weighted average from the guidecoat coating operation. VOC emissions shall not exceed 1.47 kgs/liter (12.26 lbs/gal) of applied coating solids, as a monthly volume weighted average from the topcoat coating operation.
i.	40 CFR Part 63, Subpart IIII	See b)(2)l.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)m.

(2) Additional Terms and Conditions

- a. This emissions unit consists of a primer/basecoat booth and associated manual spray area followed by a flash zone, then a clearcoat booth and associated manual spray area, a clearcoat bake oven and a cooling tunnel. Both the primer/basecoat booth and the clearcoat booth exhaust to a common carbon adsorber.
- b. The hourly and annual natural gas emission limitations and hourly coating PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- c. Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.
- d. Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.
- e. The primer/surfacer operation is regulated as a "surfacer" in accordance with the definition found in OAC rule 3745-21-01(C)(57). The definition states "surfacer means a surface coating applied to the body of an automobile or light-duty truck between the electrodeposition prime coat and the topcoat." The primer/surfacer is applied after the electrodeposition prime coat operation (K005) and before the topcoat operation.
- f. VOC emissions from this emissions unit shall be vented to a carbon adsorber that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

- g. The carbon adsorber controlling the primer/basecoat booth and clearcoat booth shall operate at a minimum VOC removal efficiency of 95%, by weight.
- h. The emission limitation under ORC 3704.03(T) is based on an assumed overall control efficiency (i.e. primer/basecoat and clearcoat booth capture efficiency x removal efficiency of carbon adsorber) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.
- i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b)(1)e.
- j. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for SO₂ is less than 10 tons per yr.
- The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).
- k. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.
- l. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

- i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.
 - ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.
 - iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.
 - iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.
 - m. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever coating is being sprayed in this emissions unit and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
 - (3) The permittee shall operate the carbon adsorber control system whenever spray coating is being applied in this emissions unit.



- (4) Emission unit K003 shall be limited to a production rate of 5000 units (vehicles) per rolling 12-month period, measured in the paint department.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Production Rate. Rows range from 1 to 1-12 with values increasing from 417 to 5000.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (5) The permittee shall burn only natural gas as fuel in this emissions unit.
(6) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
(7) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
(8) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee.
(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator.

based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when coating was being sprayed in the emissions unit(s), as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) If demonstrating compliance with the daily pound VOC per gallon deposited solids limitation from OAC rule 3745-21-09(C)(1)(a)(v) and 3745-21-09(C)(1)(c), the permittee shall maintain records for the guidecoat/primer coating line and topcoat line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (the Protocol). The Protocol shall be used to determine, calculate, measure, and/or document each of the following factors:
 - a. the daily usage of each coating;
 - b. the VOC generated per gallon of each coating;
 - c. the volume solids content of each coating; and
 - d. the daily weighted transfer efficiency of each coating applied.

The daily volume-weighted average for each day in a month shall be calculated, using the overall control efficiency, as determined for the carbon adsorber during the most recent emissions test that demonstrated that the emissions unit was in compliance, recorded, and maintained at the end of each month:

- e. as the daily volume-weighted average of VOC per gallon of deposited solids for the application of guidecoats/surfacers; and
 - f. as the daily volume-weighted average of VOC per gallon of deposited solids for the for the application of topcoats.
- (7) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(9), to the applicable VOC emission limitation (Section b)(2)c.):
- a. the name and identification of each coating employed;
 - b. the VOC content of each coating employed;
 - c. the number of gallons of each coating employed;
 - d. the total uncontrolled VOC emissions from all coatings employed, excluding cleanup and purge materials maintained in Section d)(9), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all coatings, applied in this emissions unit times each material's VOC content (b);
 - e. the total controlled VOC emission rate from K003 for all coatings (excluding cleanup/purge) employed, calculated using the most recent capture and destruction efficiency test results for the booth and the adsorber, in pounds per month, i.e., $[(d) \times (100\% - \text{capture efficiency}) \times (100\% - \text{destruction efficiency})]$; and
 - f. the rolling, 12-month total controlled VOC emissions from all coatings (excluding cleanup/purge) employed in emission unit K003, i.e., (e) + the previous 11 month calculated total controlled VOC emissions from coatings employed in K003.
- (8) VOC emissions from cleanup/purge material usage, associated with K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation under b)(2)d.

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (9) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K002, K003, K004, and K005:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and

- d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied in emissions units K002, K003, K004, and K005, times each material's VOC content (b).
- (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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)d.):
- 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 cleanup and purge solvent employed in emissions units K002, K003, K004, and K005, represented in the applicable VOC emission limitation (Section b)(2)d.), i.e., (c) x (d).
- (11) In order to document the rolling, 12-month VOC emissions K001, K002, K003, K004, K005, and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d., in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(10)e.), to be credited to the calculations of the VOC emissions, to demonstrate compliance with the emission limitation in Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month, i.e., (a) + (b) - (c);

- f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and
 - g. the rolling, 12-month total VOC emissions from K001, K002, K003, K004, K005, and P001, i.e., (e) + the previous 11 month calculated VOC emissions from K001, K002, K003, K004, K005, and P001.
- (12) The permittee shall maintain monthly records of the following:
- a. The production rate, in units (vehicles); and
 - b. The rolling, 12-month summation of production rate, in units (vehicles).
- (13) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average VOC concentration (in ppm) of the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not be more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit(s), controlled by the carbon adsorber, was/were in compliance. Until compliance testing can be conducted, the carbon adsorber shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (14) The permittee shall properly install, operate, and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases from the carbon adsorber when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9 and shall be capable of accurately measuring the VOC concentration. The organic monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall properly install, operate, and maintain a continuous flow monitoring device and recorder that measures and records the flow rate of the exhaust gases from the carbon adsorber when the emissions unit is in operation, including periods of startup and shutdown. The flow monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 6. The flow monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

Prior to the initial compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9 and that the flow monitoring device and recorder satisfy the requirements of Performance Specification 6.

Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the carbon adsorber was/were in operation, during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
- b. a log or record of the operating time for the capture (collection) system, carbon adsorber, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (15) Whenever the monitored average VOC concentration of the exhaust gases from the carbon adsorber deviates from the limit/range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the VOC concentration of the exhaust gases from the carbon adsorber immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (16) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
 - (17) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (18) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries that identify:
 - a. all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorber was more than 20 percent greater than the average concentration recorded during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - b. any records of downtime (date and length of time) for the capture (collection) system, the carbon adsorber, or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, carbon adsorber, monitoring equipment, and the emissions unit(s).

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarter.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the 1.40 kg VOC/liter (11.68 lbs VOC/gal) applied solids or 1.47 kg VOC/liter (12.26 lbs VOC/gal) applied solids, as a monthly volume-weighted average limitations (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations);
 - b. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)c.;
 - c. any exceedance of the rolling, 12-month vehicle production limitation;
 - d. each period of time (start time and date, and end time and date) when the average VOC concentration of the exhaust gases from the carbon adsorber was outside of the range specified by the manufacturer and/or outside of the acceptable limit established during any required compliance demonstration;

- e. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the carbon adsorber;
- f. each incident of deviation described in [d] or "e" (above) where a prompt investigation was not conducted;
- g. each incident of deviation described in [d] or "e" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the VOC concentration of the exhaust gases into compliance with the acceptable limit, was determined to be necessary and was not taken; and
- h. each incident of deviation described in [d] or "e" where proper records were not maintained for the investigation and/or the corrective action(s).
- f. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

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

- (3) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any exceedance of the daily volume-weighted average of VOC per gallon of deposited solids emission limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office, within 30 days following the end of the calendar month.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
- (6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (7) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions from natural gas from emissions units K002, K003, K005, P001 and P002 combined:

0.43 lb of PE/hr;
1.86 tons of PE/yr;
0.03 lb of SO₂/hr;
0.15 ton of SO₂/yr;
24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr;
1.35 tons of VOC/yr; and
20.60 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

1.68 lbs PE/hr and 1.05 tons per year from coating overspray

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

Where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

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

c. Emissions Limitation:

VOC emissions from coatings, excluding cleanup and purge, shall not exceed 10.95 tons per rolling 12-months.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(7)(f). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and reducing solvents.

d. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(11). Formulation data or USEPA Method 24 shall be used to determine the organic compound content purge and cleanup materials.

e. Emissions Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(11). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and reducing solvents.

f. Emissions Limitation:

The carbon adsorber controlling the primer/basecoat booth and clearcoat booth shall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- ii. The emission testing shall be conducted to determine the VOC control efficiency of the carbon adsorber controlling the primer/basecoat booth and clearcoat booth. The permittee shall also determine the capture efficiency for this emissions unit.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

- iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- vi. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

- vii. 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 the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
 - (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.



4. K004, Final Repair/Polish

Operations, Property and/or Equipment Description:

Final Repair and polish including associated infrared ovens

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
a. None.
(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
a. b)(1)f., b)(2)c., c)(1), d)(7), d)(8) and e)(1).
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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists specific rules like OAC rule 3745-17-11(A)(1)(k) and ORC 3704.03(T) and their corresponding emission control measures.



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include general requirements and specific rules e-h.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b)(1)d.

b. This rule 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the calculated annual emission rate for PE and VOC are each less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).

- c. Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.
 - d. Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.
 - e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:
 - i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.
 - ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.
 - iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.
 - iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.
 - f. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- c) **Operational Restrictions**
- (1) Emission unit K004 shall be limited to a production rate of 5000 units (vehicles) per rolling 12-month period, measured in the paint department.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate</u>
1	417
1-2	833
1-3	1250
1-4	1667
1-5	2084
1-6	2501
1-7	2917
1-8	3334
1-9	3751
1-10	4167
1-11	4583
1-12	5000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each day for coatings used in the final repair operations:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
 - (2) The permittee shall collect and record the following information each month for non-coating materials (polishes and other repair materials) used in the final repair operations:
 - a. the name and identification number of each non-coating material, as applied; and
 - b. the VOC content of each non-coating material, as applied.

- (3) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(5), to the applicable VOC emission limitation (Section b)(2)c.):
- a. the name and identification of each coating, reducing solvent, or other material employed;
 - b. the VOC content of each coating, reducing solvent, or other material employed;
 - c. the number of gallons of each coating, reducing solvents, or other materials employed;
 - d. the total VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(5), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit times each material's VOC content (b); and
 - e. the rolling, 12-month total VOC emissions from all coatings, reducing solvents, or other materials, excluding cleanup and purge, employed in emission unit K004, i.e., (d) + the previous 11 month calculated total VOC emissions from coatings, reducing solvents and other materials employed in K004.
- (4) VOC emissions from cleanup/purge material usage, associated with K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation under b)(2)d.

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (5) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K002, K003, K004, and K005:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied in emissions units K002, K003, K004, and K005 times each material's VOC content (b).

- (6) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)d.):
- 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 cleanup and purge solvent employed in emissions units K002, K003, K004, and K005, represented in the applicable VOC emission limitation (Section b)(2)d.), i.e., (c) x (d).
- (7) In order to document the rolling, 12-month VOC emissions K001, K002, K003, K004, K005, and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d., in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(6)e.), to be credited to the calculations of the VOC emissions, to demonstrate compliance with the emission limitation in Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month, i.e., (a) + (b) - (c);
 - f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, , i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and

- (6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.17 lb PE/hr and 0.11 ton per year from coating overspray

Applicable Compliance Method:
To determine the worst case PE rate, the following equation shall be used:
$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$
Where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = fractional control efficiency of the control equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
 - b. Emission Limitation:
4.8 lbs VOC/gal of coating, excluding water and exempt solvents, as a daily volume weighted average

Applicable Compliance Method:
Compliance with the coating VOC limit shall be determined through daily recordkeeping of the organic compound content of each coating and material used less water and exempt solvents. Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials. The daily volume-weighted average VOC content of all materials, as applied, shall be calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.

c. Emission Limitation:

4.8 lbs VOC/gal of non-coating material, including water and exempt solvents

Applicable Compliance Method

Compliance with the non-coating material (polish and other repair materials) VOC content limit shall be determined through monthly recordkeeping of the organic compound content of each non-coating material used. Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials.

d. Emission Limitation:

VOC emissions from K004 shall not exceed 0.53 tons per rolling, 12-month period

Applicable Compliance Method

Compliance may be determined by the record keeping requirements specified in Section d)(3) above. Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials.

e. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(7). Formulation data or USEPA Method 24 shall be used to determine the organic compound content purge and cleanup materials.

f. Emissions Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(7). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and reducing solvents.



- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.



5. K005, E-coat Line

Operations, Property and/or Equipment Description:

E-Coat dip tank, rinse zones, and bake oven

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e., b)(2)c., c)(1), d)(5), d)(6) and e)(2).

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.	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 ORC 3704.03(T).
b.	ORC 3704.03(T)	VOC emissions shall not exceed 1.12 lbs/gal of coating, as applied, excluding water and exempt solvents (free solvent). Total VOC emissions (free solvent + cure solvent) from K005, excluding emissions from natural gas combustion and cleanup and purge, shall not exceed 1.32 tons per rolling, 12-month period. See b)(2)d). Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>24.53 tons of NO_x per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period.</p> <p>See b)(2)b., b)(2)f. through b)(2)i.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>0.43 lb of PE/hr; 1.86 tons of PE/yr; 0.03 lb of SO₂/hr; 0.15 ton of SO₂/yr; and 1.35 tons of VOC/yr.</p> <p>See b)(2)b., b)(2)i., and b)(2)j.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)k.
e.	OAC rule 3745-31-05(D)	See b)(2)c., b)(2)f. through b)(2)h.
f.	NSPS - 40 CFR Part 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T).
g.	40 CFR 63, Subpart IIII	See b)(2)l.
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)m.

(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 frames and body panels are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a carbon adsorber. 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.

- b. The hourly and annual natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
 - c. Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.
 - d. Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.
 - e. 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 $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ 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 (lb/gallon of applied solids) is applicable.
- * R_T is calculated in accordance with OAC rule 3475-21-09(C)(1)(a)(ii).
- f. VOC emissions from the E-Coat oven shall be vented to a carbon adsorber that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
 - g. The carbon adsorber controlling the E-Coat oven shall operate at a minimum VOC removal efficiency of 95%, by weight.
 - h. The emission limitation under ORC 3704.03(T) is based on an assumed overall control efficiency (i.e. primer/basecoat booth capture efficiency x removal efficiency of carbon adsorber) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.

- i. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.
- j. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b)(1)c.
- k. This rule 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for PE and SO₂ are each less than 10 tons per year.

- l. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:
 - i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.
 - ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to



no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

m. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) Emission unit K005 shall be limited to a production rate of 5000 units (vehicles) per rolling 12-month period, measured in the E-Coat department.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Production Rate. Rows range from 1 to 1-12.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (2) The permittee shall operate the carbon adsorber whenever the E-Coat oven is processing units.
 - (3) The permittee shall burn only natural gas as fuel in this emissions unit.
 - (4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
 - (5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (6) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and maintain monthly records for K005 which contain the following information for materials added to the E-Coat line for the purpose of determining the contribution of coatings and solvent employed in this emissions unit, excluding cleanup and purge materials, to determine compliance with the rolling, 12-month VOC emission limitation and compliance with the pound of VOC/gas limitation specified in (b)(1) above:
 - 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 solvents employed, (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 controlled 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 carbon adsorber control efficiency)]);

- k. the rolling, 12-month total controlled VOC emissions from all coatings (excluding cleanup/purge) employed, i.e., (j) + the previous 11 month calculated total controlled VOC emissions from coatings employed in K005;
- l. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids ("j" / "f");
- m. 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 (i.e., the total liquid volume contained in the e-coat system's tanks, pumps, recirculation lines, filters, etc. at the system's designed liquid operating level), in gallons; and
- n. the calculated VOC emission limitation according to the calculation in b)(2)e.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.

- (2) VOC emissions from cleanup/purge material usage, associated with K002, K003, K004, and K005 including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation under b)(2)d.

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (3) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K002, K003, K004, and K005:
 - a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied in emissions units K002, K003, K004, and K005, times each material's VOC content (b).

- (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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)d.):
- 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 cleanup and purge solvent employed in emissions units K002, K003, K004, and K005, represented in the applicable VOC emission limitation (Section b)(2)d.), i.e., (c) x (d).
- (5) In order to document the rolling, 12-month VOC emissions K001, K002, K003, K004, K005, and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d., in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(4)e.), to be credited to the calculations of the VOC emissions, to demonstrate compliance with the emission limitation in Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month, i.e., (a) + (b) - (c);
 - f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and

the exhaust gases was more than 20 percent greater than the average concentration measured during the most recent performance test that demonstrated the emissions unit was in compliance; and

- b. a log or record of the operating time for the capture (collection) system, carbon adsorber, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (9) Whenever the monitored average VOC concentration of the exhaust gases from the carbon adsorber deviates from the limit/range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the VOC concentration of the exhaust gases from the carbon adsorber immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

- (11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries that identify:
 - a. all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorber was more than 20 percent greater than the average concentration recorded during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - b. any records of downtime (date and length of time) for the capture (collection) system, the carbon adsorber, or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, carbon adsorber, monitoring equipment, and the emissions unit(s).

These quarterly summaries shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarter.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the 1.12 lbs VOC/gallon, as applied, limitation, excluding water and exempt solvents (free solvent);
 - b. any exceedance of the applicable free solvent VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)e. above;
 - c. any exceedance of the applicable total VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)e. above;
 - d. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)c.;
 - e. any exceedance of the rolling, 12-month vehicle production limitation;
 - f. each period of time (start time and date, and end time and date) when the average VOC concentration of the exhaust gases from the carbon adsorber was outside of the range specified by the manufacturer and/or outside of the acceptable limit established during any required compliance demonstration;
 - g. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the carbon adsorber;



- h. each incident of deviation described in [f] or "g" (above) where a prompt investigation was not conducted;
- i. each incident of deviation described in [f] or "g" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the VOC concentration of the exhaust gases into compliance with the acceptable limit, was determined to be necessary and was not taken; and
- j. each incident of deviation described in [f] or "g" where proper records were not maintained for the investigation and/or the corrective action(s).

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

- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
 - (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
 - (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - 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, as specified in d)(1) above.

b. Emission Limitations:

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 recordkeeping as specified in d)(1) 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 electrodeposition 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:

Emissions from natural gas from emissions units K002, K003, K005, P001 and P002 combined:

0.43 lb of PE/hr;
1.86 tons of PE/yr;
0.03 lb of SO₂/hr;
0.15 ton of SO₂/yr;
24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr;
1.35 tons of VOC/yr; and
20.60 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MMft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60,

Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emissions Limitation:

Total VOC emissions (free solvent + cure solvent) from K005, excluding emissions from natural gas combustion and cleanup and purge, shall not exceed 1.32 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(1). 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.

e. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K002, K003, K004, and K005 shall not exceed 10.84 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content purge and cleanup materials.

f. Emissions Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and solvents.

g. Emissions Limitation:

The carbon adsorber controlling the E-Coat oven shall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted to determine the VOC control efficiency of the carbon adsorber controlling the E-Coat oven. The permittee shall also determine the capture efficiency of cure volatiles in the E-Coat oven for this emissions unit.
- ii. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

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.

- iv. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

vi. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

vii. 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 the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.



6. P001, Weld Operations

Operations, Property and/or Equipment Description:

Weld Operations, including spot and MIG welding operations, with anti-spatter, solvent wiping, sealer and adhesive usage with a natural gas fired bake oven.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e., b)(2)c., c)(1), d)(2), d)(3), and e)(1).

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-21-09(U)(1)(i) and VOC content limitations. Row b: ORC 3704.03(T) and NOx/CO emissions limitations.



c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Fugitive PE from MIG welding shall not exceed 1.20 lbs/hr and 0.50 ton per year.</p> <p>Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 9.02 lbs/hr and 3.76 tons per year.</p> <p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>0.43 lb of PE/hr; 1.86 tons of PE/yr; 0.03 lb of SO₂/hr; 0.15 ton of SO₂/yr; and 1.35 tons of VOC/yr.</p> <p>See b)(2)a., b)(2)d., and b)(2)e.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid NSR)	See b)(2)c.
f.	40 CFR Part 63, Subpart IIII	See b)(2)f.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)g.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b)(1)c.

- b. This rule 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO₂, and VOC emissions from this air contaminant source since the calculated annual emission rate for PE and VOC are each less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).

- c. Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.
- d. The hourly PE, SO₂ and VOC emission limitations are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- e. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.
- f. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:
- i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.
 - ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.



- iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.
g. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) Emission unit P001 shall be limited to a production rate of 5000 units (vehicles) per rolling 12-month period, measured in the weld department.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production rate specified in the following table:

Table with 2 columns: Month(s) and Maximum Allowable Cumulative Production Rate. Rows include 1, 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, 1-8, 1-9, 1-10, 1-11, 1-12.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rate.

- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month:
a. The name and identification of each VOC containing material (anti-spatter, solvent wiping, sealer, adhesive and miscellaneous materials) employed;

- b. The VOC content of each material, as applied, in pounds per gallon;
 - c. The number of gallons of each material employed;
 - d. The total VOC emissions from this emissions unit, in pounds or tons; and
 - e. The year-to-date summation of VOC emissions from all VOC containing materials employed, in tons.
- (2) In order to document the rolling, 12-month VOC emissions K001, K002, K003, K004, K005, and P001, the permittee shall maintain monthly records of the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;
 - b. the total VOC emissions from all cleanup and purge materials employed in K002, K003, K004, and K005, subject to the applicable emission limitation in Section b)(2)d. under each of the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, to demonstrate compliance with the emission limitation found in the terms and conditions for K002, K003, K004, and K005 under Section b)(2)d., recorded and calculated as stated under the terms and conditions for K002, K003, K004, and K005, in pounds or tons per month;
 - d. The total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);
 - e. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month, i.e., (a) + (b) - (c);
 - f. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005, i.e., (d) + the previous 11 month calculated total VOC emissions from cleanup/purge employed in emissions units K002, K003, K004, and K005; and
 - g. the rolling, 12-month total VOC emissions from K001, K002, K003, K004, K005, and P001, i.e., (e) + the previous 11 month calculated VOC emissions from K001, K002, K003, K004, K005, and P001.
- (3) The permittee shall maintain monthly records of the following:
- a. The production rate, in units (vehicles); and
 - b. The rolling, 12-month summation of production rate, in units (vehicles).



- (4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the rolling 12-month VOC emissions limitation specified in b)(2)c.; and
 - b. any exceedance of the rolling 12-month vehicle production limitation.

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

- (2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lbs VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- (3) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.
- (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

Emissions from natural gas from emissions units K002, K003, K005, P001 and P002 combined:



0.43 lb of PE/hr;
1.86 tons of PE/yr;
0.03 lb of SO₂/hr;
0.15 ton of SO₂/yr;
24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr;
1.35 tons of VOC/yr; and
20.60 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emissions Limitation:

Fugitive PE from MIG welding shall not exceed 1.20 lbs/hr and 0.50 ton per year.

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit. The following calculation was used to establish the limitation (based on best engineering judgment, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office April 9, 2012):

Hourly emissions = maximum MIG wire usage (120.00 lbs/hr) x emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) = 1.20 lbs PE/hour

Annual emissions = maximum MIG wire usage (100,000 pounds per year x emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) = 0.50 tons PE/yr.

c. Emission Limitation:

Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 9.02 lbs/hr and 3.76 tons per year.



Applicable Compliance Method:

Compliance with this limit may be determined through the record keeping specified in Section d)(1) above.

d. Emission Limitation:

3.0 lbs/gal excluding water and exempt solvents of each anti-spatter, sealer, and adhesive applied to metal.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above. Formulation data from the manufacturer of the VOC containing material or US EPA Method 24 shall be used to determine the VOC content.

e. Emission Limitation:

Total VOC emissions from emission units K001, K002, K003, K004, K005, and P001 shall not exceed 33.42 tons per rolling 12-month period.

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, and reducing solvents.

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
- (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

- (1) None.



7. P002, Inspection & Repair Sanding

Operations, Property and/or Equipment Description:

Repair sanding booth and miscellaneous inspection/repair sanding

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A), OAC rule 3745-17-11(B)(1), and ORC 3704.03(T).

d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>PE from the sanding operation shall not exceed 0.80 lb/hr and 0.50 tons per year.</p> <p>Emissions from natural gas combustion in emission units K002, K003, K005, P001, and P002 combined shall not exceed:</p> <p>0.43 lb of PE/hr; 1.86 tons of PE/yr; 0.03 lb of SO₂/hr; 0.15 ton of SO₂/yr; and 1.35 tons of VOC/yr.</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).</p>
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall vent particulate emissions from the repair sanding operations to the fabric filters controlling the emissions unit
- b. The hourly PE and hourly and annual natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
 - b)(1)d.
- d. This rule 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions from this air contaminant source since the calculated annual emission rate for PE and VOC are each less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).

- e. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
 - f. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K005, P001, and P002 in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.
- c) Operational Restrictions
- (1) The permittee shall operate the fabric filter control system whenever repair sanding is occurring inside the repair sanding booth.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records that document any time periods when the fabric filter control was not in operation when repair sanding operations occurred in this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
 - b. any exceedance of the rolling, 12-month vehicle production limitation;
- These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit annual reports by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions from natural gas from emissions units K002, K003, K005, P001, and P002 combined:

0.43 lb of PE/hr;
1.86 tons of PE/yr;
0.03 lb of SO₂/hr;
0.15 ton of SO₂/yr;
24.56 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr;
1.35 tons of VOC/yr; and
20.30 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

PE from the sanding operations shall not exceed 0.80 lb/hr and 0.50 tons per year.

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit. The following calculation was used to establish the limitation (based on best engineering judgment, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office April 9, 2012):

For Repair Sanding:

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (1 - control efficiency of fabric filter control)

For Inspection Sanding (no dry filter control):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour)

where,

- volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on April 9, 2012
- maximum quantity of units sanded = 4 per hour
- control efficiency of fabric filter = 95% (assumes 100% capture).

c. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.