State of Ohio Environmental Protection Agency

Street Address:
122 S. Front Street

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

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

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
UNION COUNTY
Application No: 01-8010

DATE: October 29, 1999

Honda of America Mfg., Inc.
Joanna Bambeck
24000 Honda Parkway
Marysville, OH 43040

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$2600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, CDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install Terms and Conditions	**Issue Date: To be entered upon final issuance** **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-8010

Application Number:	01-8010
APS Premise Number:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Mfg., Inc.
Person to Contact:	Joanna Bambeck
Address:	24000 Honda Parkway Marysville, OH 43040

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

Description of proposed emissions unit(s):
MODIFICATION OF INJECTION MOLDING LINE 2 FOR 8 MOLDING MACHINES, 5 PLASTIC PELLET STORAGE SILOS, 3 NEW MOLD MACHINES, & NEW SILO.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

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

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

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. 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.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

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

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

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

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees

within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

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

9. Compliance Requirements

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

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

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

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

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

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

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

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

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

10. Permit To Operate Application

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. 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.

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

Pollutant	Tons Per Year
OC	18.26
PM	15.80

Part II -Facility Specific Terms and Conditions

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

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

I. Air Toxic Policy

1. This permit allows the use of materials specified by the permittee in the Line 2 molding operations permit to install application for these emission units. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation specified in this permit was established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is based on both the materials used and the design parameters of the emission units' exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for isopropyl alcohol and petroleum distillates using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of modeling the emissions from all Line 2 molding machines:

Pollutant: isopropyl alcohol

TLV : 983 mg/m3

Maximum Hourly Emission Rate: 1.27 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.462 mg/m3

MAGLC: 23.4 mg/m3

Pollutant: petroleum distillates

TLV : VM&P naphtha 1370 mg/m3; stoddard solvent 525 mg/m3

Maximum Hourly Emission Rate: 10.47 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3.813 mg/m3

MAGLC: VM&P naphtha 32.62 mg/m3; stoddard solvent 12.5 mg/m3

2. Physical changes or changes in the method of operation of the emission units that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, the permittee is required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but

are not limited to, the following:

a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

c. physical changes to the emission units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in their permit to install; and,

c. <u>prior to the change</u>, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emission unit(s) still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to any emissions unit, covered in this permit, or its (their) method of operation that either would require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and,

c. where computer modeling is preformed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

II. Permit Requirements

. 1. The terms and conditions of this permit shall supersede all the requirements for molding operations for Line 2 emission units contained in the previous Permits to Install for these sources, numbered 01-999, 01-5659, 01-7348, and 01-7986.

2. The term entitled "Source Operation and Operating Permit Requirements After Completion of Construction" will be satisfied by updating this emissions unit in the Title V application which has already been submitted.

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 4 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333);
		Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333);
		Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months

on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333) See A.I.2 below	

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and

d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. <u>Emission Limitation</u>

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

<u>Applicable Compliance Method</u>

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that

all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 4 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials, BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P314**

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 5 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333) See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

   g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

   h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

Emissions Unit ID: **P314**

Date: To be entered upon final issuance

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P314**

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 5 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P315**

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 6 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333) See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed

18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

   g. the calculated rolling 12-month summation of organic compound emissions from the mold release

agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding machines, to exceed 6.43 tons OC per rolling 12-months;

   d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

   e. an identification of any rolling 12-month record showing total usage of mold release

agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P315**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 6 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

Emissions Unit ID: **P315**

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 7 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to

document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P316**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 7 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 9 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to

document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P318**

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 9 (Modification)	OAC rule 3745-31-05)(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 10 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P319**

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, HPM 10 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for

Date: To be entered upon final issuance

Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and,
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337);

b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P325**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

Date: To be entered upon final issuance

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall

not exceed 48 tons per hour.

Date: To be entered upon final issuance

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and,
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337); and,

   b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

Date: To be entered upon final issuance

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P326**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P326**

Date: To be entered upon final issuance

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall

not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and,
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337); and,

   b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the

submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P327**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall

not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and,
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337); and,

   b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the

submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P328**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P328**

Date: To be entered upon final issuance

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall

not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and,
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337); and,

   b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in

accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 8 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to

document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P333**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 8 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

Date: To be entered upon final issuance

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 11 (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 11 (Modification)	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P334**

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 5	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333) See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P334**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 5	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 6	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333); Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332,

and P333)

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to

document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P335**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 6	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 7	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive materials;
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 11.83 tons total OC per rolling 12-months from molding plastics on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333);
		Organic compound emissions shall not exceed 6.43 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333);
		Material usage shall not exceed 2,000 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on Line 2 (P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333)

Date: To be entered upon final issuance

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from all mold machines on Line 2 shall not exceed 18.26 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in these molding machines shall not exceed 2,000 gallons per rolling 12-months on Line 2, including molding machines numbered P300, P314, P334, P315, P335, P316, P336, P318, P319, P332, and P333.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to calculate the 12-month rolling emissions.

II. Operational Restrictions

This permit application was submitted for the replacement of three of Line 2's mold machines; P334 to replace P314, P335 to replace P315, and P336 to replace P316. At no time shall more than 8 machines be running at any one time on Line 2.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information, at the end of each month for the Line 2 molding operations:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent,

and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

f. the rolling 12-month summation of each polymer type of plastic pellets molded on Line 2 molding machines (tons/rolling 12-months);

g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents; and,

h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including all molding machines in operation and in maintenance on Line 2):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours any of Line 2 molding machines were in operation and/or maintenance) (hrs./day); and,

   d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic materials, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents, used in Line 2 molding

machines, to exceed 6.43 tons OC per rolling 12-months;

d. an identification of any monthly record showing OC emissions, from the molded plastics on Line 2 molding machines, to exceed 11.83 tons OC per rolling 12-months; and,

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2,000 gallons on Line 2.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the operating Line 2 machines, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

11.83 tons OC emissions per rolling 12-months from molding plastic on Line 2

6.43 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents on Line 2

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used on Line 2; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure federal enforceability during the first 12 calendar months of this permit, emissions calculated from material usage records from the previous 12 calendar months of operation, shall be used to

document the 12-month rolling emissions.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on Line 2 molding machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Date: To be entered upon final issuance

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and Line 2's hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of each mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Injection Molding Line 2, MHI 7	OAC rule 3745-31-05(A)(3)	27.3 lbs OC/hr for all Line 2 molding machines combined when using non-PRM see B.I.2 below

2. Additional Terms and Conditions

2.a When using photochemically reactive materials BAT is compliance with OAC rule 3745-21-07(G)(2). When using non-photochemically reactive materials, BAT is compliance with 27.3 pounds of OC/hour for all Line 2 molding machines combined.

2.b The hourly OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit. The facility Air Toxic Policy for Line 2 molding machine operations is found in the Facility Specific Terms and Conditions, Part II, Section B.

II. Operational Restrictions

The permittee shall not clean more than 3 molding machines from Line 2 in any single hour of time.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall document and record any period of time in which more than 3 molding machines on Line 2 are cleaned in any one hour of time.

IV. Reporting Requirements

The permittee shall submit an excursion report for any day in which more than 3 molding machines on Line 2 are cleaned at one time.

Date: To be entered upon final issuance

V. Testing Requirements

Emission Limitation

27.3 lbs OC/hr for all Line 2 molding machines combined when using non-photochemically reactive materials

Applicable Compliance Method

27.3 pounds of OC/hour is calculated using the worst case scenario, which would include cleaning at least 3 molding machines at one time (8 lbs/hr maximum capacity cleaning each machine).

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive and shall document and report any period of time in which more that 3 molding machines are being cleaned at once.

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 15.8 tons/yr from loading plastic pellet storage silos for Line 2 molding operations, emission units P325, P326, P327, P328, P329, and P337
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for Line 2 molding operations. Line 2 silos are numbered P325, P326, P327, P328, P329, and P337. Twenty four tons per hour is the physical limitation and the manufacture's

stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall not exceed 48 tons per hour.

Date: To be entered upon final issuance

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for Line 2 plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and,
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Line 2's molding operations pellet storage silos (P325, P326, P327, P328, P329, and P337); and,

   b. an identification of any annual record showing an exceedance the limits of 15.8 tons of particulate matter per year for Line 2's pellet storage silos.

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the six Line 2 silo emissions, or may be included in a total of Line 2 molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

Date: To be entered upon final issuance

V. Testing Requirements

Compliance with the particulate emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Emission Limitation

38.4 lbs. PM/hour from pneumatic loading of plastic pellets into Line 2 storage silos
15.8 tons PM/year from pneumatic loading of plastic pellets into Line 2 storage silos

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the Line 2's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P337**

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Storage Silo with pneumatic loading of plastic pellets, Line 2	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.