



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LOGAN COUNTY**

CERTIFIED MAIL

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

Application No: 05-10278

Fac ID: 0546000117

DATE: 11/23/2004

Honda of America East Liberty Plant
Jeff Waid
11000 State Rte 347
East Liberty, OH 43319

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

SWDO

XXXX



**Permit To Install
Terms and Conditions**

**Issue Date: 11/23/2004
Effective Date: 11/23/2004**

FINAL PERMIT TO INSTALL 05-10278

Application Number: 05-10278
Facility ID: 0546000117
Permit Fee: **\$600**
Name of Facility: Honda of America East Liberty Plant
Person to Contact: Jeff Waid
Address: 11000 State Rte 347
East Liberty, OH 43319

Location of proposed air contaminant source(s) [emissions unit(s)]:
**11000 State Rte 347
East Liberty, Ohio**

Description of proposed emissions unit(s):
Administrative Modification to permit more flexibility in plastic parts coating (K015).

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the 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.9 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

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Issued: 11/23/2004

Facility ID: 0546000117

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

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. 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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. 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).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. 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.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	201.59 + 2.95 (oven)
PM	8.64 + 2.04 (oven)
CO	22.51 (oven)
NOx	26.80 (oven)
SO2	0.16 (oven)

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

Provided the facility meets the definition of an affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP (MACT PPPP), the emissions units subject to MACT PPPP shall comply with the requirements of MACT PPPP by the compliance date of April 17, 2007. In addition, the facility would be subject to the applicable portions of the MACT General Provisions (Subpart A) and any other subparts referenced within the terms of Subparts PPPP and A. The terms MACT PPPP are incorporated into the Title V Operating Permit for this facility.

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

None.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
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K015 - Plastic parts coating line (including): air supply houses, bake oven, thermal incinerator, and	OAC rule 3745-31-05(A)
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40 CFR Part 63, Subpart PPPP

OAC rule 3745-21-07(G)(2)

OAC rule 3745-17-10

overspray	OAC rule 3745-17-11
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OAC rule 3745-31-05(C)

Hondæ
PTI A
Issued: 11/23/2004

Emissions Unit ID: **K015**

Applicable Emissions
Limitations/Control
Measures

3512 lbs VOC/day
172 lbs PM/day

Oven Emissions:
0.47 lb PM/hr, 2.04 TPY
PM,
0.04 lb SO₂/hr, 0.16 TPY
SO₂,
6.12 lbs NO_x/hr, 26.8 TPY
NO_x,
5.14 lbs CO/hr, 22.51 TPY
CO,
0.67 lb TOC/hr, 2.95 TPY
TOC

See A.2.a. below.

The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

7.46 lb PM/hr

See terms A.II.1., 2., 3.

188 tons VOC per rolling,

12-month summation of the monthly emissions.

8.64 tons of PM per rolling 12-month summation of the emissions.

See Part II.A of this permit.

2. Additional Terms and Conditions

- 2.a The pound per day limitations for VOC and PM are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.

II. Operational Restrictions

- The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1200 degrees Fahrenheit.
- The maximum material usage for this emissions unit shall not cause VOC emissions to exceed 188 tons per rolling 12-month period, calculated according to the following formula:

$$188 \text{ tons OC} \geq \sum_{n=1}^i [(C_i)(OC_i)(1-(\text{capture} * \text{DRE}))] \div 2000 + \sum_{n=1}^j [(S_j)(OC_j)] \div 2000 - (R) \div 2000$$

where:

C_i = usage of coating i , in gallons

S_j = usage of purge and cleanup solvent j , in gallons

OC_{ij} = organic compound content of the material in pounds per gallon

capture = percent of organic compounds captured by the associated thermal incinerator (%)

DRE = OC destruction efficiency of the associated thermal incinerator (%)

R = amount of OC recovered in the purge system, in pounds

- The maximum material usage for this emissions unit shall not cause PM emissions to exceed 8.64 tons per rolling 12-month period, calculated according to the following formula:

$$8.64 \text{ tons PM} \geq \sum_{n=1}^i [(C_i)(D_i)(NV_i)(1-TE)(1-RE)] \div 2000$$

where:

C_i = usage of coating i , in gallons

D_i = density of coating i , in pounds per gallons

NV_i = non-volatile percentage (solids) of coating i, in percent by weight

TE = transfer efficiency of the coating onto the substrate (%)

RE = particulate removal efficiency of the underbooth waterwash system (%)

4. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain monthly records of the following information for the purpose of determining the annual particulate matter emissions, based upon a 12-month summation of the monthly emissions:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The density of each coating, in pounds per gallon.
 - d. The non-volatile percentage (solids) of each coating, in percent by weight.
 - e. The rolling, 12-month summation of the total PM emissions, according to the formula in A.II.3.
 3. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation

of the monthly emissions:

- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The rolling, 12-month summation of the total controlled VOC emissions, according to the formula in A.II.2.
4. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in §63.4530 of that subpart in the manner detailed in §63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for PM.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.
4. These reports as denoted in terms A.IV.1., 2., and 3. are due by the date described in Part I-General Terms and Conditions of this permit under section (A)(1).
5. As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in §§63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

V. Testing Requirements

Honda of America East Liberty Plant

PTI Application: 05 10270

Issued

Facility ID: 0546000117

Emissions Unit ID: **K015**

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

- a. Emission Limitation:

188 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in term A.III.1. and 3.

b. Emission Limitation:

Emissions of PM from this emission unit shall not exceed 8.64 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section A.III.2. of this permit.

c. Emission Limitation:

7.46 lbs PM/hr - Overspray

Applicable Compliance Method:

Compliance with the hourly over-spray particulate emission limitation shall be determined using the following equation:

$$E = S(G)(1 - TE) * CE$$

Where:

E= emission rate

S = pounds of solids per gallon

G = gallons of coating per hour (gallons per month / hours per month)

TE = transfer efficiency

CE = control efficiency (95%)

d. Emission Limitation:

0.47 lb PM/hr, 0.04 lb SO₂/hr, 6.12 lbs NO_x/hr, 5.14 lb CO/hr, 0.67 lb TOC/hr - Natural gas combustion

Applicable Compliance Method:

Multiply the emissions factor Ef per unit [million cubic feet] by the maximum hourly [61,200 cubic feet] rate.

Where:

Ef = 7.6 lbs for particulate

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PTI A
Issued: 11/23/2004

Emissions Unit ID: **K015**

0.6 lb for SO₂
 100 lbs for NO_x
 84 lbs for CO
 11 lbs for TOC

e. Emission Limitation:

2.04 TPY PM, 0.16 TPY SO₂, 26.8 TPY NO_x, 22.51 TPY CO, 2.95 TPY TOC - Natural gas combustion

Applicable Compliance Method:

Multiply the emissions factor Ef per unit [million cubic feet] by the maximum hourly [61,200 cubic feet] rate, times the maximum hours of operation and divide by 2,000 pounds per ton.

Where:

Ef = 7.6 lbs for particulate
 0.6 lb for SO₂
 100 lbs for NO_x
 84 lbs for CO
 11 lbs for TOC

2. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP §63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in §63.4540 through §63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plastic parts coating line (including) : Air supply houses, bake oven, thermal incinerator and Over spray		

2. Additional Terms and Conditions

- 2.a Compliance with Ohio Administrative Code (OAC) rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy, the applicable OAC rules and the mass emissions limitations listed in Part III, term B.I.1., the use of an incinerator, and compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The permit to install for this emissions unit K015 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Facility ID: 0546000117

Emissions Unit ID: K015

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and

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

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Plastic parts polish and repair	OAC rule 3745-31-05(A)(3)	Emissions of Volatile organic Compounds (VOC) shall not exceed 32.88 lbs VOC/day, 0.74 TPY VOC
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-31-05©)	The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
		See term A.II.1.
		0.74 tons VOC per rolling, 12-month summation of the monthly emissions

2. Additional Terms and Conditions

- 2.a The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

II. Operational Restrictions

1. The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed

0.74 ton per rolling 12-month period, calculated according to the following formula:

$$0.74 \text{ ton VOC} \geq \sum_{n=1}^i [(M_i)(OC_i)] \div 2000$$

where:

M_i = usage of cleanup or touch-up coating material i , in gallons

OC_i = the organic compound content of material i , in pounds per gallon

2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The rolling, 12-month summation of the total VOC emissions, calculated according to the formula in A.II.1.
2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in §63.4530 of that subpart in the manner detailed in §63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-monthly emission limitation for VOC.

This report is due by the date described in Part I-General Terms and Conditions of this permit under section (A)(1).

2. As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall

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submit all applicable reports and notifications detailed in §§63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

V. Testing Requirements

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

Emission Limitation:

0.74 ton per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term A.III.1.

2. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP §63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in §63.4540 through §63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Plastic parts polish and repair		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permit to install for this emissions unit P020 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 1.37

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 821.0

MAGLC (ug/m3): 2286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that

show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Miscellaneous solvents on plastic parts	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds shall not exceed 970.8 lbs VOC/day. See A.2.a. below.
	OAC rule 3745-21-07(G)(2)	The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	OAC rule 3745-31-05©)	See term A.II.1 12.85 tons VOC per rolling, 12-month summation of the monthly emissions

2. Additional Terms and Conditions

- 2.a The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

II. Operational Restrictions

1. The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed 12.85 tons per rolling 12-month period, calculated according to the following formula:

$$12.85 \text{ tons VOC} \geq \sum [(S_i)(OC_i)] \div 2000$$

i

n=1

where:

S_i = usage of solvent material i , in gallons

OC_i = the organic compound content of material i , in pounds per gallon

2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The rolling, 12-monthly summation of the total VOC emissions, according to the formula in A.II.1.
2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in §63.4530 of that subpart in the manner detailed in §63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

This report is due by the date described in Part I-General Terms and Conditions of this permit under section (A)(1).

2. As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in §§63.4510 and 63.4520 of that subpart,

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provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

V. Testing Requirements

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

Emission Limitation:

12.85 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term A.III.

2. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP §63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in §63.4540 through §63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Miscellaneous solvents on plastic parts		

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (ug/m3): 233,000

Maximum Hourly Emission Rate (lbs/hr): 40.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.133

MAGLC (ug/m3): 5547.62

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Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that

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show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.