State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
LOGAN COUNTY

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

Application No: 05-13872
Fac ID: 0546000117

DATE: 4/28/2005

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

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 **$200** 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.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **SWDO** **IN**

LOGAN COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **05-13872** FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America East Liberty Plant

On 4/28/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America East Liberty Plant**, located at **11000 State Rte 347, East Liberty**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-13872:

Modification of sealer/deadener coating line to allow for higher VOC content materials.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

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

DRAFT PERMIT TO INSTALL 05-13872

Application Number:	05-13872
Facility ID:	0546000117
Permit Fee:	**To be entered upon final issuance**
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):
Modification of sealer/deadner coating line to allow for higher VOC content materials.

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

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.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.

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

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

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

Pollutant	Tons Per Year
VOC coatings	1268.65 tons for emissions units K001 - K003 and K005 - K012, combined
VOC cleanup	103.3 tons for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined

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 §§63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII (MACT IIII), the emissions units subject to MACT IIII shall comply with the requirements of MACT IIII by the compliance date of April 26, 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 IIII and A. The MACT IIII terms 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
K002 - sealer/deadner coating line with thermal incinerator controls (Terms in this permit supersede those identified in PTI 05-07923 issued on April 17, 1996.)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-08(B) and 3745-23-06(B)
	OAC rule 3745-18-06(E)
	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)
	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)
	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)
	40 CFR Part 63, Subpart IIII
	OAC rule 3745-21-09(U)

Applicable Emissions Limitations/Control Measures	
	rule 3745-31-05(A)(3) (for the fuel burning equipment associated with this emissions unit).
Volatile organic compound (VOC) emissions shall not exceed 14.1 lbs per hour (see A.I.2.d below.)	None (see A.I.2.g below.)
See A.I.2.a, b, and c below.	None (see A.I.2.h below.)
Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator : 0.06 lb PE(filterable)/hr 0.02 lb SO2/hr 3.3 lbs NOx/hr 2.8 lbs CO/hr 0.2 lb VOC/hr See A.I.2.e below.	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). See Part II.A. of this permit above.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-21-09(U) and 3745-23-06(B).	
The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents. See A.I.2.f below.	
The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC	

2. Additional Terms and Conditions

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

The monitoring, record keeping and reporting requirements to ensure compliance with the emission limitation above are contained in the Final Title V Operating Permit, Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this permit.

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

The monitoring, record keeping and reporting requirements to ensure compliance with the emission limitation above are contained in the Final Title V Operating Permit, Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this permit.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

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

2.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA

approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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

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

II. Operational Restrictions

1. 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 more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

   The monitoring, record keeping and reporting requirements to ensure compliance with the production limitations above are contained in the Final Title V Permit, Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this permit.

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

4. As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.3093 and 63.3094 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

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 more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

3. The permittee shall collect and record the following information each month for this emissions unit:

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

b. the mass of VOC per volume of each coating (in pounds/gallon, excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the total controlled VOC emissions, in pounds, for all the coatings employed [summation of (number of gallons of each coating, excluding water and exempt compounds) x (VOC content of each coating, excluding water and exempt compounds) for all coatings] x (1 - the overall control efficiency as determined during the most recent emission testing that demonstrated compliance).

4. As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall collect and keep all applicable records of the data and information detailed in §63.3130 of that subpart in the manner detailed in §63.3131 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

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

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

4. As of the applicable compliance dates from 40 CFR Part 63, Subpart IIII, the permittee shall submit all applicable reports and notifications detailed in §§63.3110 and 63.3120 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

V. Testing Requirements

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):

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

   Applicable Compliance Method:
   Compliance with the mass VOC per volume of coating limitations shall be determined through the record keeping requirements established in Sections A.III.3. of this permit.

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

   Applicable Compliance Method:
   Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in the Title V Operating Permit Part III - Section A.III.2. of emissions unit K003 as issued on 09/07/04.

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

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

   Applicable Compliance Method:
   Compliance with the allowable VOC emission limitations shall be determined through the record

keeping requirements established in the Title V Operating Permit Part III - Section A.III.3. of emissions unit K003 as issued on 09/07/04.

4. Emission Limitations:
0.06 lb PE (filterable)/hr
0.02 lb SO2/hr
3.3 lbs NOx/hr
2.8 lbs CO/hr
0.2 lb VOC/hr

Applicable Compliance Method:

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

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

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

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

*** All PE is assumed to be PM10

5. Emission limitation:
14.1 lbs VOC/hr

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation may be determined as follows:

Eh = VOCu * [Be + (1 - Be) * (1 - De)]

where,

Eh = maximum VOC emissions (lbs/hr)
VOCu = the maximum VOC usage of 60.01 pounds (this is based upon maximum usage and maximum VOC content for both the sealer materials and deadner materials);
Be = the maximum uncaptured emissions from the booth based upon engineering estimates of

15% or 0.15
De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

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

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

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

7. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the requirements as described in the Title V Operating Permit.

VI. Miscellaneous Requirements

Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in this emissions unit in the future without first obtaining a permit modification if the requirements of the
exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 33 MMBTU/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations and operational restrictions for natural gas sources specified in this permit and the Ohio EPA, Southwest District Office is notified of installation in writing within 30 days of operation startup.

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
K002 - sealer/deadner coating line with thermal incinerator controls (Terms in this permit supersede those identified in PTI 05-07923 issued on April 17, 1996.)	None	None

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