State of Ohio Environmental Protection Agency

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

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: 05-14163
Fac ID: 0546000117

DATE: 11/17/2005

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

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

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 11/17/2005**
Terms and Conditions	**Effective Date: 11/17/2005**

FINAL PERMIT TO INSTALL 05-14163

Application Number:	05-14163
Facility ID:	0546000117
Permit Fee:	**$1500**
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):
Injection molding machine.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Record keeping and Reporting Requirements

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

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 record keeping 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 record keeping 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

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

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

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 re-issuance, or modification

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

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

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

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

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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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 <u>obtained before</u> 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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)

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

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	8.38

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

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	Applicable Emissions Limitations/Control Measures
P025 - Injection Molding Machine (Terms in this permit supercede those identified in PTI 05-12752 issued 9/25/2003)	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined. The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a.
	OAC rule 3745-31-05(C)	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined. VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.

2. Additional Terms and Conditions

2.a The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2.b The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$4.82 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$3.56 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The company name and identification for each liquid organic material employed; and

b. Whether or not each liquid organic material employed is a photochemically reactive material.

2. The permittee shall maintain monthly records of the following information for emissions units P025 P026 and P027, combined:

a. The company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;

b. The volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;

c. The VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;

d. The rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents per rolling, 12-month summation, as calculated in Part III - Section A.II.2. of this permit;

e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;

f. The VOC content of the plastic pellet material employed, in pound(s) per pound; and

g. The rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

IV. Reporting Requirements

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

a. Any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07(G)(9);

b. Any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025 P026 and P027, combined; and

c. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

V. Testing Requirements

Compliance with the emission limitations in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

19.5 lbs VOC/hour = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)

where:

PP = the maximum hourly plastic pellet usage,
PPv = the VOC content of the plastic pellets,
MR = the maximum hourly mold release usage,
MRv = the VOC content of the mold release,
MP = the maximum hourly mold protectant usage,
MPv = the VOC content of the mold protectant,

MC = the maximum hourly mold cleaner usage,
MCv = the VOC content of the mold cleaner,
WS = the maximum hourly wiping solvent usage,
WSv = the VOC content of the wiping solvent,

* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995)

2. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

3. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P025 - Injection Molding Machine (Terms in this permit supercede those identified in PTI 05-12752 issued 9/25/2003)		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol

TLV (ug/m3): 491,500

Maximum Hourly Emission Rate (lbs/hr): 13.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 944.5

MAGLC (ug/m3): 11,702

2. 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 still 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.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the 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.

III. Monitoring and/or Record keeping Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P026 - Injection Molding Machine (Terms of this permit supercede those identified in PTI 05-12752 issued on 9/25/2003)	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined. The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a.
	OAC rule 3745-31-05(C)	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined. VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.

2. Additional Terms and Conditions

2.a The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2.b The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$4.82 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per, rolling 12-months, calculated using the following formula:

$$3.56 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The company name and identification for each liquid organic material employed; and

b. Whether or not each liquid organic material employed is a photochemically reactive material.

2. The permittee shall maintain monthly records of the following information for emissions units P025 P026 and P027, combined:

a. The company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;

b. The volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;

c. The VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;

d. The rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents per rolling, 12-month summation, as calculated in Part III - Section A.II.2. of this permit;

e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;

f. The VOC content of the plastic pellet material employed, in pound(s) per pound; and

g. The rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

IV. Reporting Requirements

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

a. Any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07(G)(9);

b. Any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025 P026 and P027, combined; and

c. Any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

V. Testing Requirements

Compliance with the emission limitations in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

19.5 lbs VOC/hour = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)

where:

PP = the maximum hourly plastic pellet usage,

PPv = the VOC content of the plastic pellets,
MR = the maximum hourly mold release usage,
MRv = the VOC content of the mold release,
MP = the maximum hourly mold protectant usage,
MPv = the VOC content of the mold protectant,
MC = the maximum hourly mold cleaner usage,
MCv = the VOC content of the mold cleaner,
WS = the maximum hourly wiping solvent usage,
WSv = the VOC content of the wiping solvent,

* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995)

2. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

3. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P026 - Injection Molding Machine (Terms of this permit supercede those identified in PTI 05-12752 issued on 9/25/2003)		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol

TLV (ug/m3): 491,500

Maximum Hourly Emission Rate (lbs/hr): 13.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 944.5

MAGLC (ug/m3): 11,702

2. 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 still 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.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the 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.

III. Monitoring and/or Record keeping Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P027 - Injection Molding machine which will operate in conjunction with existing injection machines P025 and P026 in PTI 05-12752. (Terms of this permit supercede those of PTI 05-12752 issued 9/25/2003).	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined. The requirements of this rule shall also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.a.
	OAC rule 3745-31-05(C)	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined. VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.

2. Additional Terms and Conditions

2.a The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material unless otherwise exempt pursuant to OAC rule 3745-21-07(G)(9). "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2.b The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$4.82 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

2. The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons per, rolling, 12-months calculated using the following formula:

$$3.56 \text{ tons VOC} \geq \sum_{i=1}^{n} \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of mold agent or cleaning solvent *i* in gallons
VOC_i = Volatile organic compound content of material *i* in pounds VOC per gallon.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. The company name and identification for each liquid organic material employed; and

b. Whether or not each liquid organic material employed is a photochemically reactive material.

2. The permittee shall maintain monthly records of the following information for emissions units P025 P026 and P027, combined:

a. The company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;

b. The volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;

c. The VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;

d. The rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents per rolling, 12-month summation, as calculated in Part III - Section A.II.2. of this permit;

e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;

f. The VOC content of the plastic pellet material employed, in pound(s) per pound; and

g. The rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

IV. Reporting Requirements

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

a. Any monthly record showing noncompliance with the photochemically reactive material usage limitation for this emissions unit, i.e., no photochemically reactive materials unless exempt per OAC rule 3745-21-07(G)(9);

b. Any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025 P026 and P027, combined; and

c. Any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These reports are due by the dates described in Part I - General Terms and Conditions of this permit under Section A.2.

V. Testing Requirements

Compliance with the emission limitations in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:

19.5 lbs VOC per hour, for emission units P025, P026 and P027 combined.

Applicable Compliance Method:

The hourly VOC emission limitation was established by the following calculation:

19.5 lbs VOC/hour = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)

where:

PP = the maximum hourly plastic pellet usage,

PPv = the VOC content of the plastic pellets,
MR = the maximum hourly mold release usage,
MRv = the VOC content of the mold release,
MP = the maximum hourly mold protectant usage,
MPv = the VOC content of the mold protectant,
MC = the maximum hourly mold cleaner usage,
MCv = the VOC content of the mold cleaner,
WS = the maximum hourly wiping solvent usage,
WSv = the VOC content of the wiping solvent,

* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995)

2. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

3. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in Part III - Section A.III.2. of this permit.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P027 - Injection Molding machine which will operate in conjunction with existing injection machines P025 and P026 in PTI 05-12752. (Terms of this permit supercede those of PTI 05-12752 issued 9/25/2003).		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol

TLV (ug/m3): 491,500

Maximum Hourly Emission Rate (lbs/hr): 6.29

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 403.0

MAGLC (ug/m3): 11,702

2. 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 still 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.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the 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.

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None