



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

12/08/03

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit (TVP041)**

01-80-00-0130  
Honda of America Manufacturing, Inc.  
Stephen Fogle  
24000 Honda Parkway  
Marysville, OH 43040-9251

Dear Stephen Fogle:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on (not issued). The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Ohio EPA, Division of Air Pollution Control  
Jim Orlemann, Manager, Engineering Section  
Preliminary Proposed Title V Permit Correspondence  
122 South Front Street  
Columbus, Ohio 43215**

and

Central District Office  
3232 Alum Creek Drive  
PO Box 1049  
Columbus, OH 43216-1049  
(614) 728-3778

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,

  
Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Central District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**PRELIMINARY PROPOSED TITLE V PERMIT**

Issue Date: 12/08/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 01-80-00-0130 to:  
**Honda of America Manufacturing, Inc.**  
 24000 Honda Parkway  
 Marysville, OH 43040-9251

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

K401 (MMP Line 1 (old K001)) MMP: Coating of metal and non-metal parts, including coating booths and natural gas fired flash off, electric fired flash off and air supply houses.	K403 (MMP Line 3 (old K003)) MMP: Coating of metal and non-metal parts, including coating booths, flash zones, and natural gas fired bake oven and air supply houses	fired bake oven and air supply houses P408 (MMP Paint Mix (old P008)) MMP: Miscellaneous clean-up activities in the paint mix room
K402 (MMP Line 2 - Steel Line (old K002)) MMP: Coating of metal and non-metal parts, including coating booth and natural gas fired bake oven.	K404 (MMP Line 4 (old K004)) MMP: Coating of metal and non-metal parts, including coating booths, flash zones, and natural gas	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office  
 3232 Alum Creek Drive  
 PO Box 1049  
 Columbus, OH 43216-1049  
 (614) 728-3778

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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Christopher Jones  
 Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 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, i.e., in Section A.III of Part III of this Title V permit, 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.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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 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.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:
- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. **Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. **Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **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, in accordance with A.10 below. 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.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

## **9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**11. 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.

*(Authority for term: OAC rule 3745-77-07(B))*

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
*(Authority for term: OAC rule 3745-77-07(G))*

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**5. 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.

**6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

1. The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products and Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subparts PPPP and MMMM, respectively. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.
2. If the final NESHAP standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard or by May 15, 2003, whichever is later. It must contain the following information, unless otherwise specified by future U.S. EPA regulations:
  - a. for a new affected source, the anticipated date of startup of operation;
  - b. the hazardous air pollutants (HAPs) emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;
  - c. any existing federal, State, or local limitations or requirements applicable to the affected source;
  - d. for each affected emission point or group of affected emission points, an identification of control technology in place;
  - e. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and
  - f. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

- a. recommended emission limitations for the affected source and support information (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);
  - b. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and
  - c. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
3. If the NESHAP is promulgated before the Part II application is due for the relevant source category, the permittee may be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. If subject, the permittee shall submit the following notifications:
    - a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
      - i. the name and mailing address of the permittee;
      - ii. the physical location of the source if it is different from the mailing address;
      - iii. identification of the relevant MACT standard and the source's compliance date;
      - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
      - v. a statement confirming the facility is a major source for HAPs.

**A. State and Federally Enforcable Section (continued)**

- b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
- i. the methods used to determine compliance;
  - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;
  - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
  - iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;
  - v. an analysis demonstrating whether the affected source is a major source or an area source;
  - vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
  - vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

**A. State and Federally Enforcable Section (continued)**

**4. The following insignificant emissions units are located at this facility:**

Z903 MMP Steel Line Pretreatment and Dry-Off Oven;  
Z904 MMP Assembly Fluid Fill Operations;  
Z905 MMP Paint Effluent Operationis;  
Z906 MMP Paint Rust Preventative Application, Service Parts;  
Z907 MMP Assembly Misellaneous Lubricants Applicants;  
Z913 MMP Plastic Pretreatment and Dry-Off Oven;  
Z914 MMP QC Portable Arc Welder;  
Z925 MMP Welding NOx Rust Application;  
Z926 MMP Paint Rust Preventative Application, Tank Flush;  
Z928 MMP Tank Line Touch-Up;  
Z933 Miscellaneous Assembly Coating Application;  
Z939 MMP Steel Line Mezzanine Touch-Up;  
L401 MMP Equipment Services Cold Cleaner, Old L001;  
Z911 MMP Assembly Cold Cleaner;  
Z915 MMP QC Sandblast Unit;  
Z927 MMP Pretreatment Bench-Top Laboratory Testing;  
Z940 Service Center Cold Cleaner;  
G404 MMP Assembly Gasoline Dispensing Facility, Old G004;  
K232 MMP Assembly Adhesive Application (PTI 01-5656)  
K405 MMP Polish Area Touch-Up Booth, Old K005;  
K410 MMP Miscellaneous Off-Line Repair (PTI 01-6641)  
P404 MMP Welding Operations, Old P004 (01-5655);  
P405 MMP Welding Operations, Old P005 (01-5655);  
P407 MMP Dry Sanding Booth, Old P007;  
P410 MMP Polish Booth, Old P010;  
P411 MMP Polish Booth, Old P011;  
P412 MMP Polish Booth, Old P012;  
P413 MMP Polish Booth, Old P013;  
T404 MMP 4000-Gallon Volatile Material Storage Tank, Old T004;  
T405 MMP 5000-Gallon Volatile Material Storage Tank, Old T005;  
Z938 MMP QA Lab-MAP;  
P406 MMP Plastic Injection Molding, HPM;  
P414 MMP Plastic Injection Molding, KOBE;  
P415 MMP Plastic Injection Bulk Material Storage;  
P416 MMP Plastic Injection Bulk Material Storage;  
R405 MMP Plastic Adhesive Application;  
R406 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R407 MMP Miscellaneous Solvent Usage (PTI 01-6640);

**A. State and Federally Enforceable Section (continued)**

R408 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R409 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R410 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R411 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
Z401 MMP Off-Line Touch-Up;  
Z657 MMP MS Miscellaneous Painting;  
Z658 MMP MS Shutdown NOx Rust Application;  
Z659 MMP PA Masking/Cleaning DA Body;  
Z660 MMP QC Paint Touch-Up;  
Z897 MMP WE New Model Welders;  
Z898 MMP QC Engine Firing;  
Z899 MMP AF Engine Assembly;  
Z944 MMP AF Packing Rust Preventative;  
Z934 MMP Weld shutdown Rustproofing;  
Z935 MMP Weld Tank Washer;  
Z936 MMP Weld Leak Check Tanks; and  
Z937 MMP Weld Machining Operations.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-23.

**B. State Only Enforceable Section**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** MMP Line 1 (old K001) (K401)

**Activity Description:** MMP: Coating of metal and non-metal parts, including coating booths and natural gas fired flash off, electric fired flash off and air supply houses.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 1 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI #01-08584)	The volatile organic compound (VOC) content of any coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycles and metal motorcycle parts.  Particulate emissions (PE) from overspray shall not exceed 13.14 tons/yr.  Lead emissions from coatings shall not exceed 1.0 lb/hr.  Emissions from the combustion of natural gas in the drying oven and incinerator serving this emissions unit shall not exceed:  1.05 lbs of nitrogen oxides (NOx)/hr and 4.60 tons of NOx/yr; 0.88 lb of carbon monoxide (CO)/hr and 3.86 tons of CO/yr; 0.02 lb of PE/hr (filterable) and 0.09 ton of PE/yr (filterable); and 0.06 lb of organic compounds (OC)/hr and 0.25 ton of OC/yr.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(D)	OC emissions shall not exceed 54.4 tons per rolling, 12-month period.  Lead emissions shall not exceed 0.5 ton per rolling, 12-month period.
	OAC rule 3745-21-09(U)(1)	See Sections A.II.3 and A.II.4 below.  Pursuant to OAC rule 3745-21-09(U)(2)(i), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) when coating motorcycles.  The VOC content of any coating employed in this emissions unit shall not exceed 5.1 lbs of VOC/gallon of solids when coating non-motorcycle metal parts that are not subject to OAC rule 3745-21-09(C).
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	PE from coating overspray shall not exceed 2.98 lbs/hr, based on Table I from this rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See Section A.I.2.d below.

**2. Additional Terms and Conditions**

- 2.a** The emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a control (destruction) efficiency of not less than 90%. Based on emission testing conducted for emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the oven shall be considered to be approximately 3% of the total uncontrolled emissions.
- 2.b** The hourly and annual PE limitations are based on the emissions unit's potentials to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure compliance with these emission limitations.
- 2.c** The hourly lead emission limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure compliance with this emission limitation.

## **2. Additional Terms and Conditions (continued)**

- 2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-08584.

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.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-08584.

## **II. Operational Restrictions**

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.
2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
3. The coating, purge, reducing solvents, and cleanup material usage, combined, shall not exceed 45,050 gallons per rolling, 12-month period.
4. The coating usage shall not exceed 17,370 gallons per rolling, 12-month period for all coatings that contain lead.

## **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:
  - a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non-photochemically reactive, and/or exempt as per OAC rule 3745-21-07(G)(9);
  - b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - c. the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;
  - d. the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in lbs/hr (average).

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage; and to document the VOC and lead contents of coatings applied in the coating operation:
  - a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;
  - b. the VOC content of all coatings, as applied, in pounds per gallon or percent by weight;
  - c. the VOC content of all coatings, reducing solvents, purge, and cleanup materials, in pounds per gallon or percent by weight;
  - d. the lead content of all coatings, as applied, in pounds per gallon or percent by weight;
  - e. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - f. the total number of gallons or pounds of each coating employed that contains lead;
  - g. the calculated total VOC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;
  - h. the calculated total lead emission rate for all coatings, in pounds per month;
  - i. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery and/or disposal at an outside facility, and the mass (lbs) of VOC to be credited the calculations of K401's emissions, to demonstrate compliance with the limit(s) in Section A.I.1., recorded, tested, and calculated as per Section A.III.3.
  - j. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in K401, in pounds or tons (i.e., (g) - (i, lbs));
  - k. the rolling, 12-month coating, purge, reducing solvent, and cleanup material usage in this emissions unit, in gallons;
  - l. the rolling, 12-month coating usage for all coatings that contain lead, in gallons;
  - m. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit; and
  - n. the rolling, 12-month lead emissions from coatings employed in the emissions unit.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings, reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:
  - a. the date the recovery drum or tank was emptied;
  - b. the date the materials from the recovery drum or tank were shipped off site;
  - c. the number of gallons of materials from the recovery drum or tank shipped off site;
  - d. the OC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - e. the total OC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total OC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emissions units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.
4. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.
5. 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.
6. The permittee shall collect and record the following information each day for the control equipment:
  - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
  - b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
7. During any period of time when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), the permittee shall collect and record the following information at the end of each such month:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-08584, issued on November 7, 2002: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day; and
  - b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the water curtain was not in service when the emissions unit was in operation.
3. 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 above while the emissions unit was in operation.
4. The permittee shall submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
5. The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing the use of noncomplying coatings, exceeding 3.0 pounds of VOC per gallon, when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
6. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of non-complying coatings, exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycles or motorcycle parts.
7. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month VOC limitation.
8. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month lead limit.
9. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling 12-month record showing the total use of coatings to exceed 45,050 gallons.
10. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling 12-month record showing the total use of coatings that contain lead to exceed 17,370 gallons.
11. The quarterly deviation reports referenced above shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

Emission Limitation:

8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials (PRM), shall be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or US EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of coatings, reducing solvents, and photochemically reactive purge/cleanup materials used (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed, for all materials used. Hourly emissions may be calculated by multiplying the OC content of the coatings, reducing solvents, and photochemically reactive purge and cleanup materials used (lbs OC/gallon of material) times each materials' maximum usage in any hour (gallons/hr). The maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented as follows:

OC emissions/hr = [(OC/gal of coating) x (maximum coating usage in gal/hr)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/hr)] + [(OC/gal of PRM purge material) x (maximum PRM purge material usage in gal/hr)] + [(OC/gal of PRM cleanup material) x (maximum PRM cleanup material usage in gal/hr)] or:

OC emissions/hr = { [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)] } x { [(1 day /hours of operation)] } and;

OC emissions/day = [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)]

2. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

3. Emission Limitation:

2.98 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water wall control system found in Sections A.II.1, A.III.4, and A.IV.2, and the calculation performed pursuant to OAC 3745-17-11(B)(1). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**V. Testing Requirements (continued)**

**4. Emission Limitation:**

13.14 tons PE/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit may be based on meeting the requirements for the water wall control system specified under Sections A.II.1, A.III.4, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

**5. Emission Limitation:**

Lead emissions from coatings shall not exceed 1.0 lb/hr.

Applicable Compliance Method:

This emission limitation was determined by multiplying the maximum usage of coatings that contain lead (17.37 gallons/hr) by the maximum coating density of 8.224 pounds/gallon of any coating containing lead. The result was multiplied by the maximum lead content of the coatings based on MSDS sheets at the facility (0.7%).

**6. Emission Limitation:**

0.5 ton lead per rolling, 12 months

Applicable Compliance Method:

Compliance with this limit may be determined through 12-month, rolling recordkeeping, as specified in Section III.2. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months' emission calculations.

**7. Emission Limitation:**

The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less than 90%. Based on testing conducted on emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 3% of the total uncontrolled emissions.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emissions control device and Methods 204A through F for capture efficiency. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for the incinerator controlling this emissions unit on April 18, 2002. The emissions test demonstrated compliance with the destruction efficiency limitation for this emissions unit.

**V. Testing Requirements (continued)**

**8. Emission Limitation:**

5.1 lbs VOC/gallon for any coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C)

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.7, of coating usage, and the volatile organic compound content of each coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), in K401. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatingsto be used in the calculation of emissions.

**9. Emission Limitation:**

6.5 lbs VOC/gallon for any coating applied to metal motorcycles or motorcycle parts

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to motorcycles and/or motorcycle parts in K401. Formulation data from the coating's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

**10. Emission Limitations:**

Emissions from natural gas usage in the drying oven from this emissions unit shall not exceed:

1.05 lb NO<sub>x</sub>/hr;  
4.6 tons NO<sub>x</sub>/yr;  
0.88 lb CO/hr;  
3.86 tons CO/yr;  
0.02 lb PE/hr (filterable);  
0.09 ton PE/yr (filterable);  
0.06 lb OC/hr; and  
0.25 ton OC/yr.

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven and incinerator. These emission limitations were determined by multiplying the maximum natural gas usage from the drying oven (10,500 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

**11. Emission Limitation:**

54.4 tons OC/VOC per rolling, 12 months

Applicable Compliance Method:

Compliance with this limit may be determined through 12-month, rolling record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months emission calculations.

Facility Name: **Honda of America Mfg., Inc.**  
Facility ID: **01-80-00-0130**  
Emissions Unit: **MMP Line 1 (old K001) (K401)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 1 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	Ohio Air Toxics Policy	See Below

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit K401 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" pollutants:

Pollutant: Cyclohexanone  
 TLV (mg/m3):  
 Maximum Hourly Emission Rate (lbs/hr): 45.07  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1419 (Stack 1015)  
 MAGLC (ug/m3): 2308

Pollutant: Methyl N-Amyl Ketone  
 TLV (mg/m3): 233  
 Maximum Hourly Emission Rate (lbs/hr): 90.2  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4599 (Stack 1015)  
 MAGLC (ug/m3): 5547

Pollutant: 1,2,4 Trimethylbenzene  
 TLV (mg/m3): 123  
 Maximum Hourly Emission Rate (lbs/hr): 14.66  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 316.6 (Stack 1015)  
 MAGLC (ug/m3): 2928

### **III. Monitoring and/or Record Keeping Requirements (continued)**

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 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, 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.).
3. 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.

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.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** MMP Line 2 - Steel Line (old K002) (K402)

**Activity Description:** MMP: Coating of metal and non-metal parts, including coating booth and natural gas fired bake oven.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 2 - metal and non-metal powder coating line with natural gas baking oven	OAC rule 3745-31-05(A)(3) (PTI 01-08318)	<p>Particulate emissions (PE) from the coating's application, storage, and handling shall not exceed 0.10 ton of particulate emissions per year.</p> <p>Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:</p> <p>0.75 lb NOx/hr;            3.31 tons NOx/yr;            0.63 lb CO/hr;            2.78 tons CO/yr;            0.01 lb PE/hr (filterable);            0.04 ton PE/yr (filterable);            0.04 lb OC/hr; and            0.18 ton OC/yr</p> <p>See A.I.2.a below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(9), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).</p>
	OAC rule 3745-31-05(D) (PTI 01-08318)	Organic compound (OC) emissions not to exceed 13.1 tons per rolling, 12 months from coatings and cleanup materials, calculated using the formula in section A.I.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.II.3 below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(U)(1)	No VOC content limit when coating metal motorcycles or motorcycle parts; Honda Motorcycle exempt pursuant to OAC rule 3745-21-09(U)(2)(i), when coating motorcycles.
	OAC rule 3745-17-07(A)(1)	The VOC content of any non-powder coating employed in K402 shall not exceed 3.0 pounds of VOC/gallon when coating metal, non-motorcycle parts that are not subject to OAC rule 3745-21-09(C).
	OAC rule 3745-17-11(B)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (PTI #01-08318); and see A.II.1.

**2. Additional Terms and Conditions**

- 2.a** The powder coatings applied in this emissions unit shall not exceed an organic compound content of 12%, by weight.
- 2.b** The maximum coating and cleanup material usage, for this emissions unit, shall not cause emissions to exceed 13.1 tons of OC per rolling 12 months, calculated using the following formula:

the 12-month rolling coating and cleanup material OC emissions (13.1 tons) = summation of all coatings and cleanup materials such that  $(P_i) \times (OC_{pi}) / 2000 + (S_j - S_r) \times (OC_{sj}) / 2000$

where:

- P<sub>i</sub> = Usage of powder coating i in pounds
- OC<sub>pi</sub> = OC content of powder coat i in % by weight
- S<sub>j</sub> = Usage of cleanup material j in gallons
- S<sub>r</sub> = Recovery of cleanup material j in gallons
- OC<sub>sj</sub> = OC content of clean-up material j in pounds per gallon

The credit for the recovered material shall be calculated proportionately according to this emissions unit's OC contribution by volume to the drum or container to be sent off-site, as per Section A.III.2.

**II. Operational Restrictions**

- 1. The powder coating operation shall not be operated without the use of the primary and secondary filters.
- 2. The powder coating line shall be run through two coating booths, built in series. Motorcycle bodies and/or parts shall be coated in only one of the two coating booths at any one time. A second color booth will reduce the amount of purge and cleanup materials needed for line color changes. Final touch-up or cleanup activities may be conducted in one booth after transferring production to the second booth. These additional activities shall be included in estimates of emissions.

## II. Operational Restrictions (continued)

3. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials shall be applied to non-metal, in this emissions unit.

If the facility chooses to employ photochemically reactive materials in the future, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office prior to employment. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
- the company identification for each coating, purge, and cleanup material employed;
  - the number of gallons of each purge and cleanup material and the pounds or tons of powder coating employed;
  - documentation on the content of each material employed to show that only non-photochemically reactive materials or materials exempt under 3745-21-07(G)(9) are applied in this emissions unit;
  - the total organic compound content of each coating and purge/cleanup material, in pounds per gallon or percent by weight of powder coating;
  - the calculated total organic compound emission rate for all coatings, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;
  - if a credit for recovered material is to be used, the total amount (gallons) purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery/disposal at an outside facility, and the mass (lbs) of OC/VOC to be credited to the calculations of K402's emissions, to demonstrate compliance with the limit(s) in Section A.I.1, recorded, tested and calculated as per Section A.III.2;
  - if a credit for recovered materials is used, the adjusted total OC emissions from all coatings, purge, and cleanup materials employed in K402, in pounds or tons (i.e., (e) - (f)); and
  - the rolling, 12-month organic compound emissions, calculated per the formula found in Section A.I.2.b.

Twelve month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 month's emission calculations.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:
  - a. the date the recovery drum or tank was emptied;
  - b. the date the materials from the recovery drum or tank were shipped off site;
  - c. the number of gallons of materials from the recovery drum or tank shipped off site;
  - d. the OC content of the materials from the recovery drum/tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - e. the total OC emissions (in pounds or tons) from recovered material (purge and cleanup materials), to be credited against the total OC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emission units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.
3. The permittee shall maintain records that document any time periods when the primary and secondary filters were not in service when the emissions unit was in operation.
4. During any period of time when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C) with non-powder coatings, the permittee shall collect and record the following information at the end of each such month:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-08318, issued on April 5, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify any monthly record showing the use of noncomplying coatings, a photochemically reactive material, or any materials not defined as those exempted under 3745-21-07(G)(9). The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify any record showing an exceedance of the 12% by weight OCs limit for the powder coatings applied in K402. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which indicate that the primary and/or secondary filtration systems were not in service when the emissions unit was in operation. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.
4. The permittee shall submit quarterly deviation (excursion) reports which identify any monthly record showing an exceedance of the rolling, 12-month OC limit. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

#### **IV. Reporting Requirements (continued)**

5. The permittee shall submit annual reports for this emissions unit which specify total OC emissions for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
6. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the use of noncomplying non-powder coatings, exceeding 3.0 pounds of VOC per gallon, when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.

#### **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

Emission Limitation

13.1 tons OC per rolling, 12-months from coatings and cleanup

Compliance Method

Compliance with this limit shall be determined through monthly recordkeeping, as specified in Section A.III.1, and using the formula specified in Section A.I.2.b. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

2. Emission Limitation

Particulate emissions (PE) from the application, storage, and handling of powder coatings shall not exceed 0.10 ton of particulate emissions per year

Compliance Method

Particulate emissions from the application, storage, and handling of powder coatings shall be demonstrated by maintaining records of coating usage as per Section A.III.1. Control efficiency shall be calculated at 99.9% for the primary and secondary filters combined. Malfunction of the primary and/or secondary filters, while the emissions unit is in operation, shall be recorded and reported as required in Sections A.III.3 and A.IV.3. Worst case emissions shall be documented in the following formula:

$208,000 \text{ lbs coating/yr} \times (100\% - 99.9\% \text{ control}) \times 1 \text{ ton}/2000 \text{ lbs} = 0.10 \text{ tons PE/yr}$

## V. Testing Requirements (continued)

### 3. Emission Limitation

Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed the following:

0.75 lb NO<sub>x</sub>/hr;  
3.31 tons NO<sub>x</sub>/yr;  
0.63 lb CO/hr;  
2.78 tons CO/yr;  
0.01 lb PE/hr (filterable);  
0.04 ton PE/yr (filterable);  
0.04 lb OC/hr; and  
0.18 ton OC/yr

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from two drying ovens (7,549 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to document the annual potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

### 4. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

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

### 5. Emission Limitation

3.0 lbs VOC/gallon for any non-powder coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C)

Applicable Compliance Method

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.4, of coating usage, and the volatile organic compound content of each coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), in K402. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coating to be used in the calculation of emissions.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 2 - metal and non-metal powder coating line with natural gas baking oven	Ohio Air Toxics Policy	See Below

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit (K402) 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 over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 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" pollutants at the fenceline:

Pollutant: caprolactam

TLV (mg/m3): 23 mg/m3

Maximum Hourly Emission Rate: 7.84 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 68.23 ug/m3

MAGLC : 547.6 ug/m3

### **III. Monitoring and/or Record Keeping Requirements (continued)**

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 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, 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.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** MMP Line 3 (old K003) (K403)

**Activity Description:** MMP: Coating of metal and non-metal parts, including coating booths, flash zones, and natural gas fired bake oven and air supply houses

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 3 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 01-6642)	The volatile organic compound (VOC) content of any coating employed in K403 shall not exceed 6.5 pounds/gallon, as applied, when coating metal motorcycles and metal motorcycle parts.  Particulate emissions (PE) from overspray shall not exceed 2.41 tons/yr.  Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:  0.60 lb NOx/hr; 2.63 tons NOx/yr; 0.50 lb CO/hr; 2.21 tons CO/yr; 0.01 lb PE/hr (filterable); 0.05 ton PE/yr (filterable); 0.03 lb OC/hr; and 0.15 ton OC/yr.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).
	OAC rule 3745-31-05(D) (PTI 01-6642)	Organic compounds (OC) emissions shall not exceed 81.7 tons per rolling, 12 months.  Coating and cleanup material usage shall not exceed 45,000 gallons per rolling, 12 months.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials to non-metal parts, emissions shall not exceed 8 lbs OC/hr and 40 lbs OC/day for the coatings and photochemically reactive cleanup materials used for the non-metal parts.
	OAC rule 3745-21-09(U)(1)	No VOC content limit when coating metal motorcycles or motorcycle parts; Honda Motorcycle exempt pursuant to OAC rule 3745-21-09(U)(2)(i), when coating motorcycles.
		The VOC content of any coating employed in K403 shall not exceed 5.1 pounds of VOC/gallon when coating metal, non-motorcycle parts that are not subject to OAC rule 3745-21-09(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.

**2. Additional Terms and Conditions**

- 2.a** The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less than 90%. Based on testing conducted on this emissions unit, K403, on April 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 3% of the total uncontrolled emissions.

**II. Operational Restrictions**

- 1. The permittee shall operate the water curtain whenever this emissions unit is in operation.
- 2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1200 degrees Fahrenheit and/or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:
  - a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in 3745-21-01(C), non-photochemically reactive, and/or exempt as per 3745-21-07(G)(9);
  - b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - c. the organic compound content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in pounds per gallon or percent by weight;
  - d. the total organic compound emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage; and to document the VOC content of coatings applied, as compliant where applicable, in the coating operation:
  - a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;
  - b. the VOC content of all coatings, as applied, in pounds per gallon;
  - c. the OC content of all coatings, reducing solvents, purge, and cleanup materials employed, in pounds per gallon or percent by weight;
  - d. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - e. the calculated total OC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;
  - f. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery/disposal at an outside facility, and the mass (lbs) of OC to be credited to the calculations of K403's emissions, to demonstrate compliance with the limit(s) in Section A.I.1, recorded, tested and calculated as per Section A.III.3;
  - g. if a credit for recovered materials is used, the adjusted total OC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in K403, in pounds or tons (i.e., (e) - (f, lbs));
  - h. the rolling, 12-month coating, reducing solvent, purge, and cleanup material usage in this emissions unit; and
  - i. the rolling, 12-month OC emissions from coatings, reducing solvent, purge, and cleanup materials used in this emissions unit.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings and reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:
  - a. the date the recovery drum or tank was emptied;
  - b. the date the materials from the recovery drum or tank were shipped off site;
  - c. the number of gallons of materials from the recovery drum or tank shipped off site;
  - d. the OC content of the materials from the recovery drum/tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - e. the total OC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total OC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emission units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.
4. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.
5. 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.
6. The permittee shall collect and record the following information each day for the control equipment:
  - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
  - b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
7. During any period of time when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), the permittee shall collect and record the following information at the end of each such month:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-6642, issued on August 7, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was applied to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. for the days during which a photochemically reactive material was applied to non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the water curtain was not in service when the emissions unit was in operation.
3. 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 above while the emissions unit was in operation.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month OC limit for this emissions unit.
5. The permittee shall submit annual reports for this emissions unit that specify total OC emissions for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
6. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of non-complying coatings, exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycles or motorcycle parts.
7. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling, 12-month record showing the total use of coatings to exceed 45,000 gallons.
8. The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing the use of noncomplying coatings, exceeding 3.0 pounds of VOC per gallon, when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
9. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

Emission Limitation:

8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal

Applicable Compliance Method

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials, shall be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of coatings, reducing solvents, and photochemically reactive purge/cleanup materials used (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed, for all materials used. Hourly emissions may be calculated by multiplying the OC content of the coatings, reducing solvents, and photochemically reactive purge and cleanup materials used (lbs OC/gallon of material) times each materials' maximum usage in any hour (gallons/hr); or the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented as follows:

OC emissions/hr = [(OC/gal of coating) x (maximum coating usage in gal/hr)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/hr)] + [(OC/gal of PRM purge material) x (maximum PRM purge material usage in gal/hr)] + [(OC/gal of PRM cleanup material) x (maximum PRM cleanup material usage in gal/hr)] or:

OC emissions/hr = { [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)] } x { [(1 day /hours of operation)] } and;

OC emissions/day = [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)]

2. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

3. Emission Limitation:

0.551 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.4, and A.IV.2. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**V. Testing Requirements (continued)**

**4. Emission Limitation:**

2.41 tons particulate emissions/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water curtain control system specified under Sections A.II.1, A.III.4, and A.IV.2, and recordkeeping of the monthly usage of the coatings applied.

**5. Emission Limitation:**

6.5 lbs VOC/gallon for any coating applied to metal motorcycles or motorcycle parts

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to motorcycles and/or motorcycle parts in K403. Formulation data from the coating's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

**6. Emission Limitation:**

5.1 lbs VOC/gallon for any coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C)

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.7, of coating usage, and the volatile organic compound content of each coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), in K403. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatingsto be used in the calculation of emissions.

**7. Emission Limitation:**

81.7 tons OC per rolling, 12 months

Applicable Compliance Method:

Compliance with this limit shall be determined through rolling, 12-month recordkeeping, as specified in Section A.III.2 Any recycle/recovery credit shall be calculated and applied and as per Section A.III.3. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

## V. Testing Requirements (continued)

8. Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:

0.60 lb NO<sub>x</sub>/hr;  
2.63 tons NO<sub>x</sub>/yr;  
0.50 lb CO/hr;  
2.21 tons CO/yr;  
0.01 lb PE/hr (filterable);  
0.05 ton PE/yr (filterable);  
0.03 lb OC/hr; and  
0.15 ton OC/yr

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from the drying ovens (6,000 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to document the annual potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

9. Emission Limitation:

The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less than 90%. Based on testing conducted on this emissions unit, K403, on April 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 3% of the total uncontrolled emissions.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emissions control device and Methods 204A through F for capture efficiency. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for the incinerator controlling this emissions unit on April 18, 2002. The emissions test demonstrated compliance with the destruction efficiency limitation for this emissions unit.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 3 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	Ohio Air Toxics Policy	See Below

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

### III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials applied 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. 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" pollutants at the fence line:

Pollutant: ethyl acetate

TLV: 1,441.3 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 91.161 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,206 ug/m<sup>3</sup>

MAGLC: 34,316.7 ug/m<sup>3</sup>

Pollutant: 2-ethoxyethanol

TLV: 18.43 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 5.031 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 232.2 ug/m<sup>3</sup>

MAGLC: 438.8 ug/m<sup>3</sup>

Pollutant: carbon black, after filter

TLV: 3.5 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 0.234 lbs/hr with the water curtain control

Predicted 1-Hour Maximum Ground-Level Concentration: 10.79 ug/m<sup>3</sup>

MAGLC: 83.33 ug/m<sup>3</sup>

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 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, 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.).

### **III. Monitoring and/or Record Keeping Requirements (continued)**

3. 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.
4. 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.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** MMP Line 4 (old K004) (K404)

**Activity Description:** MMP: Coating of metal and non-metal parts, including coating booths, flash zones, and natural gas fired bake oven and air supply houses

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 4 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 01-08456)	<p>The volatile organic compound (VOC) content of any coating employed in K404 shall not exceed 6.5 pounds of OC/gallon when coating metal motorcycles or motorcycle parts.</p> <p>Particulate emissions (PE) from overspray shall not exceed 6.92 tons/yr.</p> <p>Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:</p> <p>0.26 lb NOx/hr;            1.2 tons NOx/yr;            0.22 lb CO/hr;            1.0 tons CO/yr;            0.005 lb PE/hr (filterable);            0.022 ton PE/yr (filterable);            0.015 lb OC/hr; and            0.06 ton OC/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).</p>
	OAC rule 3745-31-05(D) (PTI 01-6642)	<p>Organic compound (OC) emissions shall not exceed 85.9 tons per rolling, 12-months.</p> <p>Coating and cleanup material usage shall not exceed 73,885 gallons per rolling, 12 months.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials to non-metal parts, emissions shall not exceed 8 lbs OC/hr and 40 lbs OC/day for the coatings and photochemically reactive cleanup materials used for the non-metal parts.
	OAC rule 3745-21-09(U)(1)	No VOC content limit when coating metal motorcycles or motorcycle parts; Honda Motorcycle exempt pursuant to OAC rule 3745-21-09(U)(2)(i), when coating motorcycles.
		The VOC content of any coating employed in K404 shall not exceed 5.1 pounds of VOC/gallon when coating metal, non-motorcycle parts that are not subject to OAC rule 3745-21-09(C).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from coating overspray shall not exceed 1.58 lb/hr.

**2. Additional Terms and Conditions**

- 2.a** The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less than 90%. Based on testing conducted on emissions unit K404 on September 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 2% of the total uncontrolled emissions.

**II. Operational Restrictions**

- 1. The permittee shall operate the water curtain whenever this emissions unit is in operation.
- 2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1200 degrees Fahrenheit and/or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:
  - a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in 3745-21-01(C), non-photochemically reactive, and/or exempt as per 3745-21-07(G)(9);
  - b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - c. the organic compound content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in pounds per gallon or percent by weight;
  - d. the total organic compound emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage; and to document the VOC content of coatings applied, as compliant where applicable, in the coating operation:
  - a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;
  - b. the VOC content of all coatings, as applied, in pounds per gallon;
  - c. the OC content of all coatings, reducing solvents, purge, and cleanup materials employed, in pounds per gallon or % by weight;
  - d. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - e. the calculated total OC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;
  - f. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery/disposal at an outside facility, and the mass (lbs) of OC to be credited to the calculations of K404's emissions, to demonstrate compliance with the limit(s) in Section A.I.1, recorded, tested and calculated as per Section A.III.4;
  - g. if a credit for recovered materials is used, the adjusted total OC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in K404, in pounds or tons (i.e., (e) - (f, lbs));
  - h. the rolling, 12-month coating, reducing solvent, purge, and cleanup material usage in this emissions unit; and
  - i. the rolling, 12-month OC emissions from coatings, reducing solvents, purge, and cleanup materials used in this emissions unit.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. During any period of time when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), the permittee shall collect and record the following information at the end of each such month:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

4. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings and reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:
  - a. the date the recovery drum or tank was emptied;
  - b. the date the materials from the recovery drum or tank were shipped off site;
  - c. the number of gallons of materials from the recovery drum or tank shipped off site;
  - d. the OC content of the materials from the recovery drum/tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - e. the total OC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total OC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emission units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.
5. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.
6. 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.
7. The permittee shall collect and record the following information each day for the control equipment:
  - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
  - b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring, record keeping, and reporting requirements are as or more stringent than the monitoring, record keeping, and reporting requirements contained in PTI #01-08456, issued on December 18, 2001: Paragraphs A.III and A.IV. The monitoring, record keeping, and reporting requirements contained in the above-referenced Permit to Install are subsumed into the monitoring, record keeping, and recording requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring, record keeping, and reporting requirements in the Permit to Install.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was applied to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. for the days during which a photochemically reactive material was applied to non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing the use of noncomplying coatings, exceeding 3.0 pounds of VOC per gallon, when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the water curtain was not in service when the emissions unit was in operation.
4. 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 above while the emissions unit was in operation.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month OC limit for this emissions unit.
6. The permittee shall submit annual reports for this emissions unit that specify total OC emissions for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
7. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of non-complying coatings, exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycles or motorcycle parts.
8. The permittee shall submit quarterly deviation (excursion) reports that identify any rolling, 12-month record showing the total use of coatings to exceed 45,000 gallons.
9. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

Emission Limitation:

8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials, shall be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of coatings, reducing solvents, and photochemically reactive purge/cleanup materials used (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed, for all materials used. Hourly emissions may be calculated by multiplying the OC content of the coatings, reducing solvents, and photochemically reactive purge and cleanup materials used (lbs OC/gallon of material) times each materials' maximum usage in any hour (gallons/hr); or the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented as follows:

OC emissions/hr = [(OC/gal of coating) x (maximum coating usage in gal/hr)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/hr)] + [(OC/gal of PRM purge material) x (maximum PRM purge material usage in gal/hr)] + [(OC/gal of PRM cleanup material) x (maximum PRM cleanup material usage in gal/hr)] or:

OC emissions/hr = { [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)] } x { [(1 day /hours of operation)] } and;

OC emissions/day = [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of reducing solvent) x (reducing solvent usage in gal/day)] + [(OC/gal of PRM purge material) x (PRM purge material usage in gal/day)] + [(OC/gal of PRM cleanup material) x (PRM cleanup material usage in gal/day)]

2. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

3. Emission Limitation:

1.58 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.5, and A.IV.3. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

**V. Testing Requirements (continued)**

**4. Emission Limitation:**

6.92 tons particulate emissions/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water curtain control system specified under Sections A.II.1, A.III.5, and A.IV.3, and recordkeeping of the monthly usage of the coatings applied.

**5. Emission Limitation:**

6.5 lbs VOC/gallon for any coating applied to metal motorcycles or motorcycle parts

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to motorcycles and/or motorcycle parts in K404. Formulation data from the coating's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

**6. Emission Limitation:**

85.9 tons OC per rolling, 12 months

Applicable Compliance Method:

Compliance with this limit shall be determined through rolling, 12-month recordkeeping, as specified in Section A.III.2. Any recycle/recovery credit shall be calculated and applied and as per Section A.III.4. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

**7. Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:**

0.26 lb NO<sub>x</sub>/hr;  
1.2 tons NO<sub>x</sub>/yr;  
0.22 lb CO/hr;  
1.0 tons CO/yr;  
0.005 lb PE/hr (filterable);  
0.022 ton PE/yr (filterable);  
0.015 lb OC/hr; and  
0.06 ton OC/yr.

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from the drying ovens (2,627.5 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to document the annual potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

## V. Testing Requirements (continued)

**8.** Emission Limitation:

5.1 lbs VOC/gallon for any coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C)

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.3, of coating usage, and the volatile organic compound content of each coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C), in K404. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatingsto be used in the calculation of emissions.

**9.** Emission Limitation:

The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less that 90%. Based on testing conducted on emissions unit K404 on September 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 2% of the total uncontrolled emissions.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emissions control device and Methods 204A through F for capture efficiency. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

Emissions testing was conducted for the incinerator controlling this emissions unit on April 18, 2002. The emissions test demonstrated compliance with the destruction efficiency limitation for this emissions unit.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
MMP Paint Line 4 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator	Ohio Air Toxics Policy	See Below

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials applied 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. 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" pollutants at the fence line:

Pollutant: ethyl acetate

TLV: 1,441.3 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 91.161 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,206 ug/m<sup>3</sup>

MAGLC: 34,316.7 ug/m<sup>3</sup>

Pollutant: 2-ethoxyethanol

TLV: 18.43 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 5.031 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 232.2 ug/m<sup>3</sup>

MAGLC: 438.8 ug/m<sup>3</sup>

Pollutant: carbon black, after filter

TLV: 3.5 mg/m<sup>3</sup>

Maximum Hourly Emission Rate: 0.234 lbs/hr with the water curtain control

Predicted 1-Hour Maximum Ground-Level Concentration: 10.79 ug/m<sup>3</sup>

MAGLC: 83.33 ug/m<sup>3</sup>

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 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, 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.).

### **III. Monitoring and/or Record Keeping Requirements (continued)**

3. 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.
4. 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.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** MMP Paint Mix (old P008) (P408)

**Activity Description:** MMP: Miscellaneous clean-up activities in the paint mix room

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous clean-up activities in the paint mix room	OAC rule 3745-31-05(A)(3) (PTI 01-8762)	The organic compound ( OC) content of each cleanup material shall not exceed 7.85 pounds of OC/gallon, as applied.
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with OAC rules 3745-31-05(D) and 3745-21-07(G)(2). OC emissions from cleanup materials employed in this emissions unit shall not exceed 20.2 tons per rolling, 12-month period.
	OAC rule 3745-21-07(G)(2)	Cleanup material usage in this emissions unit shall not exceed 38,400 gallons per rolling, 12-month period. On any day when employing photochemically reactive cleanup materials, emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day.

##### 2. Additional Terms and Conditions

- 2.a This emissions unit includes all miscellaneous clean-up activities that take place in the paint mix room only. All other coating and cleanup emissions are accounted for by other permits-to-install.

##### II. Operational Restrictions

1. The total cleanup material usage in this emissions unit shall not exceed 38,400 gallons per rolling, 12-month period.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material:
  - a. The company identification for each cleanup material employed, and documentation on the content of each material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non photochemically reactive, and /or exempt per OAC rule 3745-21-07(G)(9);
  - b. The number of gallons of each photochemically reactive cleanup material employed;
  - c. The OC content of each photochemically reactive cleanup material employed;
  - d. The total OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
  - e. The total number of hours the emissions unit was in operation; and
  - f. The total average hourly OC emission rate for all photochemically reactive cleanup materials, i.e. (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information for P408 each month for the purpose of determining compliance with the rolling, 12-month OC limitation:
  - a. The company identification of all cleanup materials employed;
  - b. The OC content of all cleanup materials, as applied, in pounds per gallon;
  - c. The total number of gallons or pounds of each cleanup material employed;
  - d. The calculated total OC emission rate for all cleanup materials, prior to credit for recovered materials, in pounds per month;
  - e. If a credit for recovered material is to be used, the total amount (gallons) of cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recover and/or disposal at an outside facility, and the mass (pounds) of OC to be credited to the calculation of P408's emissions, calculated as specified in Section A.III.3;
  - f. If a credit for recovered materials is used, the adjusted total OC emissions from all cleanup materials employed in P408, in pounds or tons; and
  - g. The rolling 12-month OC emissions from cleanup materials employed in this emissions unit, in tons.

### III. Monitoring and/or Record Keeping Requirements (continued)

3. If credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emissions reports, the permittee shall maintain the following records for the recovered cleanup materials and the recovery drum/tank serving this emissions unit:
  - a. the date the recovery drum was emptied;
  - b. the date the materials from the recover drum/tank were shipped off site;
  - c. the number of gallons or pounds of materials from the recovery drum/tank shipped off site;
  - d. the OC content of the materials from the recovery drum/tank, in pounds per gallon or percent by weight, acquired from the testing results of the recovered material; and
  - e. the total OC emission (in pounds or tons) from the recovered cleanup material to be credited against the total OC emissions from all coatings, reducing solvents, cleanup, purge and other materials applied in the emission units that contribute to the recovery drum/tank i.e., (c) x (d), and the proportion (85%\*) that was contributed by P408.

\* The recovery credit is an estimate for P408, as established in the Marysville Motorcycle Solvent and Coating Tracking Methodology submitted by Honda of America Mfg., Inc. in May 1995 and approved by the Ohio EPA, Central District Office in August 1996.
4. The permittee shall collect and record the rolling, 12-month cleanup material usage from P408, in gallons.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions exceeded 8 pounds/hour, and the actual average hourly OC emissions for each such day; and
  - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions exceeded 40 pounds/day, and the actual OC emissions for such a day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of noncomplying cleanup material (greater than 7.85 pounds OC/gallon).
3. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month OC limitation (20.2 tons).
4. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month cleanup material usage limitation (38,400 gallons).
5. The above quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Terms and Conditions.
6. The permittee shall submit annual reports for emissions unit P408 that specify the total OC emissions for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

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

**Emission Limitation:**

The OC content of each cleanup material shall not exceed 7.85 lbs of OC/gallon.

**Applicable Compliance Method:**

Compliance with this limit may be demonstrated through monthly record keeping, as specified in Section III.2., above. Manufacturer's formulation data or US EPA Method 24 shall be used to determine the OC content of the cleanup material.

2. **Emission Limitation:**  
OC emissions shall not exceed 20.2 tons per rolling, 12-month period.

**Applicable Compliance Limitation:**

Compliance with this limit may be demonstrated through the 12-month, rolling record keeping, as specified in Section III.2. above.

3. **Emission Limitations:**  
On any day when employing photochemically reactive cleanup materials, emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day.

**Applicable Compliance Limitation:**

Compliance with the hourly and daily OC emission limits, when using photochemically reactive materials, may be determined through the daily record keeping, as specified in Section III.1. above.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
miscellaneous clean-up activities in the paint mix room	Ohio Air Toxics Policy	See Section III. below.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit (P408) was evaluated based on the actual cleanup 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" pollutants:

Pollutant: n-butanol (assumes "worst case" concentration of 40% of cleanup material)  
 TLV (mg/m3): 60.6

Maximum Hourly Emission Rate (lbs/hr): 32.3 (assumes "worst case" concentration of 40% of n-butanol)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1377  
 MAGLC (ug/m3): 1444

Pollutant: 2-Butoxyethyl acetate (assumes concentration of 100% of cleanup material )  
 TLV (mg/m3): 131

Maximum Hourly Emission Rate (lbs/hr): 23.5 (based on a maximum "worst case" usage of three gallons per hour supplied by Honda in the permit to install application)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1000  
 MAGLC (ug/m3): 3120

### **III. Monitoring and/or Record Keeping Requirements (continued)**

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

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

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

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.

### **IV. Reporting Requirements**

**None**

### **V. Testing Requirements**

**None**

### **VI. Miscellaneous Requirements**

**None**

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