



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

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

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

02/21/2008

**CERTIFIED MAIL**

**RE: Proposed Title V Significant Permit Modification  
Chapter 3745-77 permit**

01-80-00-0130

Honda of America Manufacturing, Inc.

Attn: Stacey Coburn AR-18J  
United States Environmental Protection Agency  
Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for Honda of America Manufacturing, Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 02/21/08, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's electronic notification of this proposed action. Please contact me at (614) 644-3631 before the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

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

cc: Central District Office  
File, DAPC PIER



State of Ohio Environmental Protection Agency

**PROPOSED TITLE V SIGNIFICANT PERMIT MODIFICATION**

Original Effective Date:	Expiration Date:	Modification Effective Date: <i>To be entered upon final issuance</i>
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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	P404 (MMP Welding Operations (old P004)) MMP: Welding operations including welding, brazing, t-stud insertion, sanding and grinding operations
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 fired bake oven and air supply houses	P408 (MMP Paint Mix (old P008)) MMP: Miscellaneous clean-up activities in the paint mix room

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 3745-77-08(E) 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  
 122 South Front Street  
 Columbus, OH 43215  
 (614) 728-3778

Ohio Environmental Protection Agency

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Chris Korleski  
 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 (i.e., postmarked) 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. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) 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 (i.e., postmarked) 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 deviation reports shall satisfy the requirements 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. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

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 satisfies 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 (for the deviations so reported) the requirements 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:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any 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 (i.e., postmarked) 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. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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 and 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) and OAC rule 3745-77-07(A)(13)(b))*

- 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(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 (i.e., postmarked) 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, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). 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 or Emissions Levels**

Each IEU 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 from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which 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 Title V permit 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.  
(Authority for term: OAC rule 3745-77-01)

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

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

**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 (i.e., postmarked) 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; or
- 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; or
- 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 Enforceable Section

1. The permittee is currently subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63 Subpart Mmmm (Surface Coating of Miscellaneous Metal Parts and Products) in accordance with 40 CFR Parts 63.3880 - 63.3981 including the Table(s) and Appendix(ices) referenced in Subpart Mmmm.

The permittee is currently subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63 Subpart Pppp (Surface Coating of Plastic Parts and Products) in accordance with 40 CFR Parts 63.4480 - 63.4581 including the Table(s) and Appendix(ices) referenced in Subpart Pppp.

The following emissions units in this permit are currently subject to the aforementioned requirements: K401, K402, K403, K404, P408, and P404.

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

L401 MMP Equipment Services Cold Cleaner, Old L001; (PTI: 01-3492)  
Z911 MMP Assembly 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 (PTI 01-493);  
P410 MMP Polish Booth, Old P010 (01-3852);  
P411 MMP Polish Booth, Old P011 (01-3852);  
P412 MMP Polish Booth, Old P012 (01-3852);  
P413 MMP Polish Booth, Old P013 (01-3852);  
T404 MMP 4000-Gallon Volatile Material Storage Tank, Old T004;  
T405 MMP 5000-Gallon Volatile Material Storage Tank, Old T005;  
R406 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R407 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
  
Z909 MMP QC Dyno Line 2  
Z947 MMP QC Lab Cold Cleaner  
Z948 MMP QC Lab Chasis Dyno  
P417MMP Plastic Injection Molding (PTI: 01-8875)  
Z949 MMP PA Soda Blast Cabinet  
R408 MMP Miscellaneous Solvent Usage (PTI 01-6640);PA  
R409 MMP Miscellaneous Solvent Usage (PTI 01-6640); AF  
R410 MMP Miscellaneous Solvent Usage (PTI 01-6640);QC  
R411 MMP Miscellaneous Solvent Usage (PTI 01-6640); ES and  
K410 MMP Miscellaneous Repair Coating (PTI 01-6641).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as 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 federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

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

The following insignificant emissions units are located at this facility:

L401 MMP Equipment Services Cold Cleaner, Old L001; (PTI: 01-3492)  
Z911 MMP Assembly 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 (PTI 01-493);  
P410 MMP Polish Booth, Old P010 (01-3852);  
P411 MMP Polish Booth, Old P011 (01-3852);  
P412 MMP Polish Booth, Old P012 (01-3852);  
P413 MMP Polish Booth, Old P013 (01-3852);  
T404 MMP 4000-Gallon Volatile Material Storage Tank, Old T004;  
T405 MMP 5000-Gallon Volatile Material Storage Tank, Old T005;  
R406 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
R407 MMP Miscellaneous Solvent Usage (PTI 01-6640);  
Z909 MMP QC Dyno Line 2  
Z947 MMP QC Lab Cold Cleaner  
Z948 MMP QC Lav Chasis Dyno  
P417 MMP Plastic Injection Molding (PTI:01-8875)  
Z949 MMP PA Soda Blast Cabinet

R408 MMP Miscellaneous Solvent Usage (PTI 01-6640); PA  
R409 MMP Miscellaneous Solvent Usage (PTI 01-6640); AF  
R410 MMP Miscellaneous Solvent Usage (PTI 01-6640); QC  
R411 MMP Miscellaneous Solvent Usage (PTI 01-6640); ES and  
K410 MMP Miscellaneous Repair Coating (PTI 01-6641).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as 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 federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

**B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z904 MMP Assembly Fluid Fill Operations;  
Z905 MMP Paint Effluent Operations;  
Z906 MMP Paint Rust Preventative Application, Service Parts;  
Z907 MMP Assembly Miscellaneous Lubricants Applicants;  
Z913 MMP Plastic Pretreatment and Dry-Off Oven;  
Z925 MMP Welding NOx Rust Application;  
Z926 MMP Paint Rust Preventative Application, Tank Flush;  
Z933 Miscellaneous Assembly Coating Application;  
Z939 MMP Steel Line Mezzanine Touch-Up;  
Z946 MMP QC Gas Room;  
Z658 MMP MS Shutdown NOx Rust Application;  
Z659 MMP PA Masking/Cleaning DA Body;  
Z660 MMP PQ Paint Touch-Up;  
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; and  
Z936 MMP Weld Leak Check Tanks.

**B. State Only Enforceable Section (continued)**

The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

- Z904 MMP Assembly Fluid Fill Operations;
- Z905 MMP Paint Effluent Operations;
- Z906 MMP Paint Rust Preventative Application, Service Parts;
- Z907 MMP Assembly Miscellaneous Lubricants Applicants;
- Z913 MMP Plastic Pretreatment and Dry-Off Oven;
- Z925 MMP Welding NOx Rust Application;
- Z926 MMP Paint Rust Preventative Application, Tank Flush;
- Z933 Miscellaneous Assembly Coating Application;
- Z939 MMP Steel Line Mezzanine Touch-Up;
- Z946 MMP QC Gas Room;
- Z658 MMP MS Shutdown NOx Rust Application;
- Z659 MMP PA Masking/Cleaning DA Body;
- Z660 MMP PC Paint Touch-Up;
- 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; and
- Z936 MMP Weld Leak Check Tanks.

### 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.	OAC rule 3745-31-05(A)(3) (PTI #01-08869)	<p>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 motorcycle parts and any non-metal parts.</p> <p>Particulate emissions (PE) from overspray shall not exceed 5.49 tons/yr.</p> <p>Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:</p> <p>5.03 lbs of nitrogen oxides (NOx)/hr and 22.04 tons of NOx/yr;            4.23 lbs of carbon monoxide (CO)/hr and 18.51 tons of CO/yr;            0.10 lb of PE/hr (filterable) and 0.42 ton of PE/yr (filterable); and            0.28 lb of organic compounds (OC)/hr and 1.21 tons of OC/yr.</p> <p>See Section A.I.2.e below.</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(C).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 27.2 tons per rolling, 12-month period excluding emissions from natural gas combustion.
	OAC rule 3745-21-09(U)(1)	See Section A.I.2.c 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.
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.  This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts.
	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 1.83 lbs/hr, based on Table I from this rule.
	OAC rules 3745-21-08(B)	See Section A.I.2.d below.
	OAC rule 3745-21-09(U)(1)(a)	The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

<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)(d)	The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.
	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3880 - 63.3981
	40 CFR Part 63, Subpart PPPP	See 40 CFR Part 63.4480 - 63.4581

**2. Additional Terms and Conditions**

- 2.a** The emissions limitations outlined in this Permit To Install represent Lowest Achievable Emission Rate technology (LAER). The original LAER requirements were based on a combined VOC content of the coating lines of sources K401 - K404 and the operation of a thermal incinerator. This modification is equivalent to or more stringent than the original LAER due to the use of compliant coatings and new VOC limits.
- 2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.
- 2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 27.2 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$27.2 \text{ tons VOC} = \text{summation of all coatings and cleanup materials such that } \{[(P_i) \times (VOC_{pi})] / 2000\} - \{[(S_i) \times (VOC_{si})] / 2000\}$$

where:

P<sub>i</sub> = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds  
 VOC<sub>pi</sub> = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight  
 S<sub>i</sub> = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds  
 VOC<sub>si</sub> = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

- 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 01-08869.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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

- 2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 50.21 MMBtu/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## **II. Operational Restrictions**

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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

## **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:
- 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);
  - the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;
  - the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;
  - the total number of hours the emissions unit was in operation; and
  - 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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 content of coatings applied in the coating operation:
- the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;
  - the VOC content of all coatings, as applied, in pounds per gallon or percent, by weight;
  - the VOC content of all coatings, reducing solvents, purge, and cleanup materials, in pounds per gallon or percent, by weight;
  - the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - 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;
  - 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 to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested, and calculated as per Section A.III.6.
  - if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and
  - the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:
- the name and identification number of each coating, as applied;
  - the VOC content of each coating (excluding water and exempt solvents), as applied.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:
- the name and identification of each coating, as applied;
  - the VOC content of each coating (excluding water and exempt solvents), as applied;
  - the total number of gallons or pounds of each coating, as applied; and
  - the daily volume-weighted average VOC content of all coatings, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following information each day:
- the name and identification number of each coating, as applied;
  - the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;
  - the solids content (percent, by volume), as applied, of each coating;
  - the total number of gallons or pounds of each coating, as applied; and
  - the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

6. 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:
- the date the recovery drum or tank was emptied;
  - the date the materials from the recovery drum or tank were shipped off site;
  - the number of gallons of materials from the recovery drum or tank shipped off site;
  - the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

7. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

8. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:
- the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and
  - the total summation of OC, PE, NO<sub>x</sub>, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### 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;
  - 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;
  - c. any record showing that the water curtain was not in service when the emissions unit was in operation;
  - d. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts or non-metal parts; and
  - e. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

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 Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

- 4.3 lbs VOC/gal for clearcoat
- 3.5 lbs VOC/gal for an extreme performance coating
- 3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

- 4.3 lbs VOC/gal for clearcoat
- 3.5 lbs VOC/gal for an extreme performance coating
- 3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### IV. Reporting Requirements (continued)

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

10.3 lbs VOC/gal of solids for clearcoat

6.7 lbs VOC/gal of solids for an extreme performance coating

6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NO<sub>x</sub> emissions from natural gas combustion from emissions units K401 through K404, combined, 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 these emissions units in the annual Fee Emission Report.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### V. Testing Requirements

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

a. Emission Limitations:

8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal parts  
Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. 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.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### c. Emission Limitation:

1.83 pounds particulate emissions/hr from coating overspray

#### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### d. Emission Limitation:

5.49 tons PE/yr from coating overspray

#### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### e. Emission Limitations:

When coating metal non-motorcycle parts:

4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat  
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings  
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

#### Applicable Compliance Method:

Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### f. Emission Limitation:

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

#### Applicable Compliance Method:

Compliance with this VOC limitation 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 metal motorcycles parts and/or non-metal parts in this emissions unit. Formulation data from the coating 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### g. Emission Limitations:

Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.03 lbs of NO<sub>x</sub>/hr;  
22.04 tons of NO<sub>x</sub>/yr;  
4.23 lbs of CO/hr;  
18.51 tons of CO/yr;  
0.10 lb of PE/hr (filterable);  
0.42 ton of PE/yr (filterable); and  
0.28 lb of OC/hr;  
1.21 tons of OC/yr.

### Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined, including a 20% safety factor (50,208 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 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### h. Emission Limitation:

27.2 tons VOC per rolling, 12 month period

### Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## 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 1 - metal and non-metal parts coating line with flash-off areas, oven	Ohio Air Toxic Policy	See Section B.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 (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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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 coating line with natural gas baking oven	OAC rule 3745-31-05(A)(3) (PTI 01-08869)	<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>The volatile organic compound (VOC) content of any non-powder coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycle parts and any non-metal parts.</p> <p>See Section A.I.2.a below.</p> <p>Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:</p> <p>5.03 lbs of nitrogen oxides (NOx)/hr and 22.04 tons of NOx/yr;            4.23 lbs of carbon monoxide (CO)/hr and 18.51 tons of CO/yr;            0.10 lb of PE/hr (filterable) and 0.42 ton of PE/yr (filterable); and            0.28 lb of organic compounds (OC)/hr and 1.21 tons of OC/yr.</p> <p>See Section A.I.2.c below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C) (PTI 01-08318)	VOC emissions not to exceed 3.1 tons per rolling, 12-month excluding emissions from natural gas combustion.
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.  This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts.
	OAC rule 3745-21-09(U)(1)	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.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions 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 application shall not exceed 0.551 lb/hr, based on Table I from this rule.
	OAC rule 3745-21-09(U)(1)(a)	The VOC content of any non-powder clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any non-powder extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

<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)(d)	The VOC content of any non-powder coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.
	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3880 - 63.3981
	40 CFR Part 63, Subpart PPPP	See 40 CFR Part 63.4480 - 63.4581

**2. Additional Terms and Conditions**

- 2.a** The powder coatings applied in this emissions unit shall not exceed a volatile 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 3.1 tons of VOC per rolling, 12-month period, calculated using the following formula:

the 12-month rolling coating and cleanup material VOC emissions (3.1 tons) = summation of all coatings and cleanup materials such that  $(P_i) \times (VOC_{pi}) / 2000 + (S_j - S_r) \times (VOC_{sj}) / 2000$

where:

- P<sub>i</sub> = Usage of powder coating i, in pounds
- VOC<sub>pi</sub> = VOC content of powder coat i, in percent, by weight
- S<sub>j</sub> = Usage of cleanup material j, in gallons
- S<sub>r</sub> = Recovery of cleanup material j, in gallons
- VOC<sub>sj</sub> = VOC 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 VOC contribution, by volume, to the drum or container to be sent off-site, as per Section A.III.6.

- 2.c** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 50.21 MMBtu/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

**II. Operational Restrictions**

- 1.** The powder coating operation shall not be operated without the use of the primary and secondary filters.  
 (Authority for term: OAC rule 3745-77-07(A)(1))
- 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. 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.

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

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

1. The permittee shall collect and record the following information each month for the coating line:
  - a. the company identification for each coating, purge, and cleanup material employed;
  - b. the number of gallons of each purge and cleanup material and the pounds or tons of powder coating employed;
  - c. documentation on the content of each material employed to show that only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) are applied in this emissions unit;
  - d. the total organic compound content of each coating and purge/cleanup material, in pounds per gallon or percent, by weight, of coating;
  - e. 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;
  - f. 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 limitation(s) in Section A.I.1, recorded, tested and calculated as per Section A.III.2;
  - g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f)); and
  - h. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. During any period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each 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 the paint line, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. During any time period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:
  - a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the total number of gallons or pounds of each coating, as applied; and
  - d. the daily volume-weighted average VOC content of all coatings, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

4. During any period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an applicable pounds of VOC per gallon of solids limitation by use of control equipment, the permittee shall collect and record the following information each day:
- the name and identification number of each coating, as applied;
  - the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;
  - the solids content (percent, by volume), as applied, of each coating;
  - the total number of gallons or pounds of each coating, as applied; and
  - the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

5. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:
- 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);
  - the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;
  - the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;
  - the total number of hours the emissions unit was in operation; and
  - 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

6. 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:
- the date the recovery drum or tank was emptied;
  - the date the materials from the recovery drum or tank were shipped off site;
  - the number of gallons of materials from the recovery drum or tank shipped off site;
  - the VOC content of the materials from the recovery drum/tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - the total VOC emissions (in pounds or tons) from recovered material (purge and cleanup materials), to be credited against the total VOC 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

7. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

8. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

- the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and
- the total summation of OC, PE, NO<sub>x</sub>, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### 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;
  - 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;
  - c. any record showing the primary and/or secondary filtration systems were not in service when the emissions unit was in operation;
  - d. any monthly record showing the use of non-powder coatings, exceeding 6.5 pounds of VOC per gallon, as applied, when coating metal motorcycle parts or non-metal parts; and
  - e. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

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 Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. The permittee shall submit deviation (excursion) reports that identify any record showing an exceedance of the 12%, by weight, VOC content limitation for the powder coatings applied in this emissions unit. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. When coating metal non-motorcycle parts with non-powder coatings and using compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

4. When coating metal non-motorcycle parts with non-powder coatings and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### IV. Reporting Requirements (continued)

5. When coating metal non-motorcycle parts with non-powder coatings and complying with a pounds of VOC per gallon of solids limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following limitations:

10.3 lbs VOC/gal of solids for clearcoat

6.7 lbs VOC/gal of solids for an extreme performance coating

6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

6. The permittee shall submit annual reports that specify the total OC, PE, CO, and NO<sub>x</sub> emissions from natural gas combustion from emissions units K401 through K404, combined, 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 these emissions units in the annual Fee Emission Report.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### V. Testing Requirements

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

a. Emission Limitation:

3.1 tons VOC per rolling, 12-month period from coatings and cleanup

Applicable Compliance Method:

Compliance with this emission limitation 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 U.S. EPA 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

b. Emission Limitation:

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

Applicable 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.7 and A.IV.3. Worst case emissions shall be documented in the following formula:

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### c. Emission Limitations:

Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.03 lbs of NO<sub>x</sub>/hr;  
22.04 tons of NO<sub>x</sub>/yr;  
4.23 lbs of CO/hr;  
18.51 tons of CO/yr;  
0.10 lb of PE/hr (filterable);  
0.42 ton of PE/yr (filterable); and  
0.28 lb of OC/hr;  
1.21 tons of OC/yr.

### Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined including a 20% safety factor (50,208 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 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.8), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### d. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### e. Emission Limitations:

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 limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. 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.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### f. Emission Limitations:

When applying non-powder coatings to metal, non-motorcycle parts:

4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method:

Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.2, A.III.3, and A.III.4. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### g. Emission Limitation:

6.5 lbs VOC/gallon for any non-powder coating applied to metal motorcycle parts or non-metal parts

Applicable Compliance Method:

Compliance with this VOC limitation may be determined through monthly recordkeeping, as specified in Section A.III.1, of coating usage and the VOC content of each coating applied to metal motorcycles parts and/or non-metal parts in this emissions unit. Formulation data from the coating 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### h. Emission Limitation:

PE from coating application shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the primary and secondary filters found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## 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 Toxic Policy	See Section B.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 (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 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: 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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### **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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### **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	OAC rule 3745-31-05(A)(3) (PTI #01-08869)	<p>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 motorcycle parts and any non-metal parts.</p> <p>Particulate emissions (PE) from overspray shall not exceed 5.49 tons/yr.</p> <p>Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:</p> <p>5.03 lbs of nitrogen oxides (NOx)/hr and 22.04tons of NOx/yr;            4.23 lbs of carbon monoxide (CO)/hr and 18.51 tons of CO/yr;            0.10 lb of PE/hr (filterable) and 0.42 ton of PE/yr (filterable); and            0.28 lb of organic compounds (OC)/hr and 1.21 tons of OC/yr.</p> <p>See Section A.I.2.e below.</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(C).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 63.6 tons per rolling, 12-month period, excluding emissions from natural gas combustion.
	OAC rule 3745-21-09(U)(1)	See Section A.I.2.c 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.
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.  This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts.
	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 1.83 lbs/hr, based on Table I from this rule.
	OAC rules 3745-21-08(B)	See Section A.I.2.d below.
	OAC rule 3745-21-09(U)(1)(a)	The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

<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)(d)	The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.
	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3880 - 63.3981
	40 CFR Part 63, Subpart PPPP	See 40 CFR Part 63.4480 - 63.4581
	OAC rule 3745-21-09(U)(2)(f)(ii)	The VOC content of any coating employed in K403 shall not exceed 6.5 lbs/gallon, as applied, when coating metal automobile parts.

**2. Additional Terms and Conditions**

- 2.a** The emissions limitations outlined in this Permit To Install represent Lowest Achievable Emission Rate technology (LAER). The original LAER requirements were based on a combined VOC content of the coating lines of sources K401 - K404 and the operation of a thermal incinerator. This modification is equivalent to or more stringent than the original LAER due to the use of compliant coatings and new VOC limits.
- 2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.
- 2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 63.6 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$63.6 \text{ tons VOC} = \text{summation of all coatings and cleanup materials such that } \{[(P_i) \times (\text{VOC}_{pi})] / 2000\} - \{[(S_i) \times (\text{VOC}_{si})] / 2000\}$$

where:

P<sub>i</sub> = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds  
 VOC<sub>pi</sub> = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight  
 S<sub>i</sub> = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds  
 VOC<sub>si</sub> = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

- 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 01-08869.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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

- 2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 50.21 MMBtu/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit. An accurate list of the natural gas combustion sources shall be maintained by the facility and made available to Ohio EPA staff upon request.

## **II. Operational Restrictions**

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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

## **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:
- 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);
  - the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;
  - the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;
  - the total number of hours the emissions unit was in operation; and
  - 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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 content 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 total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - e. 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;
  - 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 and/or disposal at an outside facility, and the mass (lbs) of VOC to be credited to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested, and calculated as per Section A.III.6.
  - g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and
  - h. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:
- a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:
- a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the total number of gallons or pounds of each coating, as applied; and
  - d. the daily volume-weighted average VOC content of all coatings, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following information each day:
- the name and identification number of each coating, as applied;
  - the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;
  - the solids content (percent, by volume), as applied, of each coating;
  - the total number of gallons or pounds of each coating, as applied; and
  - the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

6. 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:
- the date the recovery drum or tank was emptied;
  - the date the materials from the recovery drum or tank were shipped off site;
  - the number of gallons of materials from the recovery drum or tank shipped off site;
  - the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

7. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

8. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

- the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and
- the total summation of OC, PE, NO<sub>x</sub>, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### 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;
  - 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;
  - c. any record showing that the water curtain was not in service when the emissions unit was in operation;
  - d. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts, metal automobile parts, or non-metal parts; and
  - e. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

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 Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

10.3 lbs VOC/gal of solids for clearcoat

6.7 lbs VOC/gal of solids for an extreme performance coating

6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NO<sub>x</sub> emissions from natural gas combustion from emissions units K401 through K404, combined, 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 these emissions units in the annual Fee Emission Report.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

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

a. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. 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.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### c. Emission Limitation:

1.83 pounds particulate emissions/hr from coating overspray

#### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### d. Emission Limitation:

5.49 tons PE/yr from coating overspray

#### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### e. Emission Limitations:

When coating metal non-motorcycle parts:

4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

#### Applicable Compliance Method:

Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### f. Emission Limitation:

6.5 lbs VOC/gallon for any coating applied to metal motorcycle parts, metal automobile parts or non-metal parts

#### Applicable Compliance Method:

Compliance with this VOC limitation 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 metal motorcycles parts, metal automobile parts and/or non-metal parts in this emissions unit. Formulation data from the coating 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### g. Emission Limitations:

Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.03 lbs of NO<sub>x</sub>/hr;  
22.04 tons of NO<sub>x</sub>/yr;  
4.23 lbs of CO/hr;  
18.51 tons of CO/yr;  
0.10 lb of PE/hr (filterable);  
0.42 ton of PE/yr (filterable); and  
0.28 lb of OC/hr;  
1.21 tons of OC/yr.

### Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined, including a 20% safety factor (50,208 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 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### h. Emission Limitation:

63.6 tons VOC per rolling, 12 month period, excluding emissions from natural gas combustion.

### Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## 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.	Ohio Air Toxic Policy	See Section B.III 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 (K403) 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: 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>

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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.	OAC rule 3745-31-05(A)(3) (PTI #01-08869)	<p>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 motorcycle parts and any non-metal parts.</p> <p>Particulate emissions (PE) from overspray shall not exceed 8.74 tons/yr.</p> <p>Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:</p> <p>5.03 lbs of nitrogen oxides (NOx)/hr and 22.04 tons of NOx/yr;            4.23 lbs of carbon monoxide (CO)/hr and 18.51 tons of CO/yr;            0.10 lb of PE/hr (filterable) and 0.42 ton of PE/yr (filterable); and            0.28 lb of organic compounds (OC)/hr and 1.21 tons of OC/yr.</p> <p>See Section A.I.2.e below.</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(C).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 141.2 tons per rolling, 12-month period excluding emissions from natural gas combustion.
	OAC rule 3745-21-09(U)(1)	See Section A.I.2.c 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.
	OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-17-07(A)(1)	This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts.
	OAC rule 3745-17-11(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rules 3745-21-08(B)	PE from coating overspray shall not exceed 2.91 lbs/hr, based on Table I from this rule.
	OAC rule 3745-21-09(U)(1)(a)	See Section A.I.2.d below.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.
	OAC rule 3745-21-09(U)(1)(c)	The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

<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)(d)	The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.
	40 CFR Part 63, Subpart MMMM	See 40 CFR Part 63.3880 - 63.3981
	40 CFR Part 63, Subpart PPPP	See 40 CFR Part 63.4480 - 63.4581

**2. Additional Terms and Conditions**

**2.a** The emissions limitations outlined in this Permit To Install represent Lowest Achievable Emission Rate technology (LAER). The original LAER requirements were based on a combined VOC content of the coating lines of sources K401 - K404 and the operation of a thermal incinerator. This modification is equivalent to or more stringent than the original LAER due to the use of compliant coatings and new VOC limits.

**2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.

**2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 141.2 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$141.2 \text{ tons VOC} = \text{summation of all coatings and cleanup materials such that } \{[(P_i) \times (VOC_{pi})] / 2000\} - \{[(S_i) \times (VOC_{si})] / 2000\}$$

where:

- P<sub>i</sub> = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
- VOC<sub>pi</sub> = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight
- S<sub>i</sub> = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
- VOC<sub>si</sub> = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

**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 01-08869.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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

- 2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 50.21 MMBtu/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## **II. Operational Restrictions**

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

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

## **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:
- 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);
  - the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;
  - the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;
  - the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;
  - the total number of hours the emissions unit was in operation; and
  - 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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 content 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 total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;
  - e. 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;
  - 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 and/or disposal at an outside facility, and the mass (lbs) of VOC to be credited to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested, and calculated as per Section A.III.6.
  - g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and
  - h. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:
- a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:
- a. the name and identification of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the total number of gallons or pounds of each coating, as applied; and
  - d. the daily volume-weighted average VOC content of all coatings, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following information each day:
- the name and identification number of each coating, as applied;
  - the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;
  - the solids content (percent, by volume), as applied, of each coating;
  - the total number of gallons or pounds of each coating, as applied; and
  - the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

6. 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:
- the date the recovery drum or tank was emptied;
  - the date the materials from the recovery drum or tank were shipped off site;
  - the number of gallons of materials from the recovery drum or tank shipped off site;
  - the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and
  - the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

7. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

8. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

- the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and
- the total summation of OC, PE, NO<sub>x</sub>, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### 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;
  - 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;
  - c. any record showing that the water curtain was not in service when the emissions unit was in operation;
  - d. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts or non-metal parts; and
  - e. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

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 Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

4.3 lbs VOC/gal for clearcoat  
3.5 lbs VOC/gal for an extreme performance coating  
3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

10.3 lbs VOC/gal of solids for clearcoat  
6.7 lbs VOC/gal of solids for an extreme performance coating  
6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NO<sub>x</sub> emissions from natural gas combustion from emissions units K401 through K404, combined, 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 these emissions units in the annual Fee Emission Report.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

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

a. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. 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.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

b. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### c. Emission Limitation:

2.91 pounds particulate emissions/hr from coating overspray

#### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### e. Emission Limitations:

When coating metal non-motorcycle parts:

4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings

3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

#### Applicable Compliance Method:

Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### f. Emission Limitation:

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

#### Applicable Compliance Method:

Compliance with this VOC limitation 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 metal motorcycles parts and/or non-metal parts in this emissions unit. Formulation data from the coating 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## V. Testing Requirements (continued)

### g. Emission Limitations:

Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.03 lbs of NO<sub>x</sub>/hr;  
22.04 tons of NO<sub>x</sub>/yr;  
4.23 lbs of CO/hr;  
18.51 tons of CO/yr;  
0.10 lb of PE/hr (filterable);  
0.42 ton of PE/yr (filterable); and  
0.28 lb of OC/hr;  
1.21 tons of OC/yr.

### Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined, including a 20% safety factor (50,208 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 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### h. Emission Limitation:

141.2 tons VOC per rolling, 12 month period, excluding emissions from natural gas combustion.

### Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### d. Emission Limitation:

8.74 tons PE/yr from coating overspray

### Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

## 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.	Ohio Air Toxic Policy	See Section B.III 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 (K404) 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: 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>

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### IV. Reporting Requirements

None

### V. Testing Requirements

None

### VI. Miscellaneous Requirements

None

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

**Emissions Unit ID:** MMP Welding Operations (old P004) (P404)

**Activity Description:** MMP: Welding operations including welding, brazing, t-stud insertion, sanding and grinding operations

#### 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>
P404 - Miscellaneous motorcycle parts welding	OAC rule 3745-31-05(A)(3) PTI # 01-05655	Welding organic compound (OC) emissions shall not exceed 1.6 pound per hour.  Combined OC emissions shall not exceed 9.0 tons per rolling, 12-months from welding, rust proofing and clean up.  7.0 tons per year OC are from welding  2.0 tons per year OC are from coatings and clean up materials as applied.
	OAC Rule 3745-17-11(B)(1)	Combined uncontrolled and controlled particulate emissions (PE) shall not exceed 0.5 pound per hour and 2.2 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1).
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule are less stringent than the emissions limit established pursuant to OAC rule 3745-31-05(A).  Visible particulate emissions from the baghouse stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See Section A.I.2.b 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)	For coating metal non-motorcycle parts, VOC emissions shall not exceed 3.0 pounds per gallon of materials applied, excluding water.  For coating metal motorcycle parts, exempt pursuant to OAC rule 3745-21-09(U)(2)(i).

## 2. Additional Terms and Conditions

- 2.a The hourly OC, hourly PE and annual PE emissions limits are based on the emissions unit's potential to emit; therefore; record keeping and reporting is not required to demonstrate compliance with these emissions limitations.
- 2.b The permittee shall vent the particulate emissions from the weld operation to the baghouse controlling this emissions unit.

## II. Operational Restrictions

- 1. The permittee shall operate the baghouse whenever the emissions unit is in operation.

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

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the purpose of determining compliance with the coating content restrictions of the coatings used in this emissions unit:
  - a. the name and identification of each OC containing coatings, as applied; and
  - b. the OC content of each material applied, excluding water, as applied, in pounds OC per gallon or percent by weight.

If the permittee mixes complying materials at a line, it is not necessary to record the OC content of the resulting mixture.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

- 2. The permittee shall collect and record the following information each month for the purpose of determining annual emissions from coatings and clean up materials used in this emissions unit:
  - a. the name and identification of each OC containing coatings and clean up materials employed;
  - b. the OC content of each coatings and clean up material, in pounds per gallon or percent by weight;
  - c. the number of gallons or pounds of each coatings and clean up material employed; and
  - d. the total OC emissions from all coatings and clean up materials employed, in pounds or tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

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

3. The permittee shall maintain records that document any time periods when the baghouse was not in service and the emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

### **IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of any material used for coating metal non-motorcycle parts exceeding 3.0 pounds VOC per gallon, excluding water. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the combined OC emissions limitation of 9.0 tons per rolling, 12-months from welding, rust proofing and clean up.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the baghouse was not in service when the emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

4. 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

## V. Testing Requirements

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

- a. Emission Limitations:

OC emissions shall not exceed 9.0 TPY combined, 1.6 lbs/hr and 7.0 TPY from welding, and 2.0 TPY from coating and clean up.

Applicable Compliance Method:

Compliance with this OC limits for welding shall be determined through the permit requirements, recordkeeping contained in the terms above and the following calculation of OC emissions based on welding materials used:

$$\text{lbOC/hr} = (\text{lbOC/weld area})(\text{weld area/weld})(\# \text{ weld/unit})(\# \text{ unit/yr})(\text{yr/actual hours})$$

$$\text{tonOC/yr} = (\text{lbOC/weld area})(\text{weld area/weld})(\# \text{ weld/unit})(\# \text{ unit/yr})(\text{ton}/2000\text{lbs})$$

Compliance with this OC limit for coating and clean up shall be determined through the permit requirements, recordkeeping contained in the terms above. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and clean up materials employed. The emissions from the coatings and clean up materials used in this emissions unit shall be calculated for the calendar year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

- b. Emission Limitation:

VOC emissions shall not exceed 3.0 lbs/gallon of coatings applied, excluding water.

Applicable Compliance Method:

Compliance with the material OC content limit shall be determined through monthly recordkeeping of the OC content of each coating used, less water. Formulation data from the coatings and clean up material's manufacturer or USEPA Method 24 shall be used to determine the OC content of the coatings.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

## **V. Testing Requirements (continued)**

- c. Emission limitations:  
PE shall not exceed 0.5 lb/hr and 2.2 tons/yr.

Applicable compliance method:

Compliance with the short term emission limitation shall be determined by multiplying the maximum throughput of the emission unit pounds weld-wire/hour by the emission factor of 0.01 lb PE/1.0 lb weld-wire (Gradient Corp for Honda). Then multiply by the capture efficiency (90%) and the control efficiency (95%). The annual emission limitation shall be determined by multiplying the hourly emission rate by 8,760 hours per year and dividing by 2,000 pounds per ton.

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) while the emissions unit is operating at or near its maximum capacity

- d. Emission limitation:  
Visible particulate emissions from the baghouse stack shall not exceed twenty percent opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

The baghouse controlling this emissions unit vents to the inside of the building. Therefore, compliance can not be determined through U.S. EPA Method 9 visible emissions observations at the stack. Compliance with this limit shall be based on meeting the requirements for the baghouse control found in Sections A.II.1, A.III.3, and A.IV.3 of Part III.

If required, compliance may be determined through visible emissions observations performed at any non-stack egress point from the building housing this emissions unit (i.e., doorways, windows, roof monitors, etc) in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-05655)

## **VI. Miscellaneous Requirements**

1. 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>
P004 - Miscellaneous motorcycle parts welding	None	None

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

### 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

- 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(C)	The requirements of this rule also include compliance with OAC rules 3745-31-05(C) 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.
	40 CFR Part 63, Subpart MMMM 40 CFR Part 63, Subpart PPPP	On any day when employing photochemically reactive cleanup materials, OC emissions shall not exceed 8 lbs/hour and 40 lbs/day. See Attachment 1 of this permit. See Attachment 2 of this permit.

##### 2. Additional Terms and Conditions

- 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

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

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

### 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 cleanup 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

2. The permittee shall collect and record the following information for this emissions unit each month for the purpose of determining compliance with the rolling, 12-month OC emission 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 this emissions unit, in pounds or tons; and
  - g. the rolling, 12-month OC emissions from cleanup materials employed in this emissions unit, in tons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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:
- the date the recovery drum was emptied;
  - the date the materials from the recover drum/tank were shipped off site;
  - the number of gallons or pounds of materials from the recovery drum/tank shipped off site;
  - 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
  - the total OC emissions (in pounds or tons) from the recovered cleanup materials to be credited against the total OC emissions from all coatings, reducing solvents, cleanup, purge and other materials applied in the emissions units that contribute to the recovery drum/tank i.e., (c) x (d), and the proportion (85%\*) that was contributed by this emissions unit.

\* The recovery credit is an estimate for this emissions unit, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

4. The permittee shall collect and record the rolling, 12-month cleanup material usage rate for this emissions unit, in gallons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-8869)

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- for the days during which a photochemically reactive cleanup material was employed, an identification of each day during which the average hourly OC emissions exceeded 8 lbs/hour, and the actual average hourly OC emissions for each such day;
  - for the days during which a photochemically reactive cleanup material was employed, an identification of each day during which the OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day;
  - any monthly record showing the use of a noncomplying cleanup material (i.e., a cleanup material with greater than 7.85 lbs of OC/gallon);
  - any monthly record showing an exceedance of the rolling, 12-month OC emission limitation (20.2 tons); and
  - any monthly record showing an exceedance of the rolling, 12-month cleanup material usage limitation (38,400 gallons).

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 Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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

2. The permittee shall submit annual reports for this emissions unit 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### **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:

- a. Emission Limitation:

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

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

- b. Emission Limitation:

OC emissions shall not exceed 20.2 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated through the record keeping, as specified in Section A.III.2 above.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

- c. Emission Limitations:

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

Applicable Compliance Method:

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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

#### **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 Toxic Policy	See Section B.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

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### 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.).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI # 01-08869)

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

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