



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

Mailing Address:

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

06/10/08

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77
permit**

05-46-00-0101
Honda Transmission Mfg. of America Inc.
Lee A. Sanders
6964 State Route 235 North
Russells Point, OH 43348

Dear Lee A. Sanders:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Southwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Southwest District Office.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Southwest District Office
Indiana



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/10/08	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
----------------------	---	--

This document constitutes issuance of a Title V permit for Facility ID: 05-46-00-0101 to:
Honda Transmission Mfg. of America Inc.
6964 State Route 235 North
Russells Point, OH 43348

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

L002 (Wash-01) Vacuum Parts Washer w/ Solvent Recovery Distillation	P026 (Dynamometer #1, 2 & 3) Dynamnometer #1, 2 & 3 w/ Thermal Oxidizer (TO installed 7/11/2005)	P031 (Carb 5 - Carburizing Furnace) Heat Treat Gears
L003 (Wash-02) Vacuum Parts Washer w/ Solvent Recovery Distillation	P027 (Carb 1 - Carburizing Furnace) Heat Treat Gears	P033 (Carb 7 - Carburizing Furnace) Heat Treat Gears
L004 (Wash-03) Vacuum Parts Washer w/ Solvent Recovery Distillation	P028 (Carb 2 - Carburizing Furnace) Heat Treat Gears	P034 (Carb 8 - Carburizing Furnace) Heat Treat Gears
L005 (Wash-04) Vacuum Parts Washer w/ Solvent Recovery Distillation	P029 (Carb 3 - Carburizing Furnace) Heat Treat Gears	P036 (2000 Ton Cutting & Forging Press) Billet Cutting, Hot Forging, Heating & Normalizing Gears
	P030 (Carb 4 - Carburizing Furnace) Heat Treat Gears	

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:

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911
(513) 285-6357

Ohio Environmental Protection Agency

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. Z019, 800 Die Cast Machine #1;
Z020, 2250 Die Cast Machine #1;
Z023, Tempering Furnace (Lanly);
Z025, Gasoline Dispensing Operation;
Z026, Gasoline AGST #1;
Z027, Gasoline AGST #2;
Z028, Natural Gas Usage;
Z029, Dry Milling Machines Line #1;
Z030, Dry Milling Machines Line #2;
Z040, Bulk Coolant Storage Tanks (2 - 2,500 Gallon);
Z050, Valve Body NC Machines (Smog Hog & Absolent Filter Systems);
Z051, Diesel Generator #2 (Mezz);
Z052, Diesel Generator #3 (Mezz);
Z053, Diesel Generator #4 (Potable water Pump House);
Z054, 8,000 Gallon HPDC WW Tank;

Z055, Emergency Fire Pump Diesel Fuel Tank #2;
Z056, 1650 Die Cast Machine #3;
Z057, 800 Die Cast Machine #2;
Z059, TQ - Detergent Cold Cleaner;
Z060, Inline - Detergent Cold Cleaner;
Z061, PED - Detergent Cold Cleaner;
Z062, Trinco Sland Blast Unit;
Z064, Die Maintenance Parts Washer;
Z065, C1 Line (S Gear);
Z066, T3 Line (S Gear);
Z067, Counter Shaft Line;
Z068, Final Driven Line;
Z069, SI Line (S Gear);
Z070, Hob Grinder (ATG Tool Room);

Z071, Tool Re grind Parts Washer (ATG Tool Room);
Z072, Shot Blast Unit # 1 (Heat Treat);
Z073, Shot Blast Unit # 2 (Heat Treat);
Z075, Diesel Generator #5 (DTX);
Z076, Diesel Generator #6 (Forging);
Z077, 7,488 Gallon Oil Storage Tank T-700;
Z078, 7,488 Gallon Oil Storage Tank T-750;
Z079, 5,760 Gallon Oil Tank T-2;
Z080, 11,800 Gallon UF Process Tank #1;
Z081, 11,800 Gallon UF Process Tank #2;
Z082, 1,000 Gallon Effluent Tank T-800;
Z083, 1,000 Gallon Impreg Sludge Tank;
Z084, 12,000 Gallon Impreg Storage Tank T-3;
Z085, 1,000 Gallon Reactor Tank;
Z086, Propane Tank; and
Z087, machining (ATG Tool Room).

A. State and Federally Enforceable Section (continued)

The following insignificant emissions units are located at this facility are exempt from permit requirements because they are exempt under OAC rule 3745-31-03(A) and/or defined as "insignificant" under OAC rule 3745-77-01(U):

P002, Diesel Generator # 1 (Mezz);
Z001, Yard Dog Diesel Fuel Tank;
Z002, 5000 Gallon WWTP Used Oil Tank T-4;
Z003, 15,000 Gallon ATF Storage Tank;
Z004, Indust. Pump House Diesel Fuel Tank;
Z005, 87,000 Gallon WWTP Tank T-1;
Z006, 3,250 Gallon Impreg Process Tank;
Z008, Emergency Fire Pump Diesel Fuel Tank #1;
Z009, Welding Maintenance;
Z011, Aqueous Parts Cleaners;
Z017, 1650 Die Cast Machine #1;
Z018, 1650 Die Cast Machine #2;

2. Upon renewal of the Title V for this facility, emissions unit P026, the dynamometer #1, 2, & 3, will need to comply with the requirements of 40 CFR Part 64 CAM.

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 and/or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P003 Modern Aluminum # 1;
P004 Modern Aluminum # 2;
Z007, Exx Print Valve Body Pump Test Machine;
Z010, Paved Roadways;
Z012, Schaefer Furnace 1650 #3;
Z013, Schaefer Furnace 800 #1;
Z014, Schaefer Furnace 800 #2;
Z015, Schaefer Furnace 2250 #1;
Z016, Schaefer Receiving Furnace;
Z021, Zinc Shot Blast (Die Cast Area);
Z022, Ladle Transfer;
Z024, Test Track;
Z031, Dry Milling Machines Line #3 (No controls);
Z032, TC Final Washer;
Z033, MC Final Washer;
Z034, Line 2 Intermediate Washer;

Z035, Line 3 Intermediate Washer;
Z036, MC Line 1;
Z037, MC Line 2;
Z039, MC Line 3;
Z041, Line 1 Intermediate Washer (2);
Z042, Assembly Line 1;
Z043, Assembly Line 2;
Z044, Line 1 Coolant System;
Z045, Line 2 Coolant System;
Z046, Line 3 Coolant System;
Z047, Impregnation Machine;
Z048, Line 2 Repair Machine;
Z049, Shaft Line;
Z058, In Line Analysis;
Z063, Sumitomo Uni-Washer; and
Z074, Making Compound (\$-Wheel Drive Assembly).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Wash-01 (L002)

Activity Description: Vacuum Parts Washer w/ Solvent Recovery Distillation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L002 - WASH-01: includes vacuum parts washer with solvent recovery distillation	OAC rule 3745-31-05(A)(3) (PTI 05-13647) OAC rule 3745-21-09(O)(4)	Volatile organic compound (VOC) emissions shall not exceed 3.98 pounds per hour, as a monthly average, and 17.43 tons per year. See Operational Restrictions in Sections A.II.1., A.II.2., A.II.3., A.II.4. and A.II.5.

2. Additional Terms and Conditions

- 2.a The annual VOC emissions limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The vacuum parts washer shall employ a sufficient drain time to prevent cleaned parts from carrying out solvent liquid or vapor.
2. The permittee shall operate and maintain a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
3. The permittee shall operate and maintain a distillation system for the vacuum parts washer. The distillation system shall be operated at all times except during maintenance.
4. The vacuum parts washer shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. maintain the system as a closed loop system;
 - b. provide downtime covers for closing off the entrance and exit during shutdown hours;
 - c. minimize carry-out emissions by:
 - i. racking parts so that solvent drains freely from parts and is not trapped;
 - ii. store waste solvent only in covered containers; and
 - iii. repair solvent leaks immediately, or shut down the degreaser;
 - d. place downtime covers over entrances and exits of the vacuum parts washer at all times when the conveyors and exhausts are not being operated; and
 - e. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ any halogenated solvents within this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. the types of solvents employed in the vacuum parts washer;
 - b. whether or not the solvent employed is a halogenated solvent; and
 - c. all control equipment maintenance.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the volume of solvent containing cleaning agent employed, i.e., the sum of the volume of solvent within the parts washer at the beginning of the month and the volume of solvent added during the month subtracted from the volume of solvent remaining at the end of the month;
 - b. the VOC emissions, i.e., the volume of the solvent containing cleaning agent employed (from a. above) multiplied by the VOC content of the agent, and finally multiplied by a safety factor of 110%;
 - c. the number of hours the vacuum parts washer operated; and
 - d. the average hourly emission rate, i.e., the monthly VOC emissions (from b. above) divided by the number of hours operated (from c. above).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. average hourly VOC emissions limitation of 3.98 lbs; and
 - b. the use of halogenated solvents.

These reports shall be submitted in accordance with the schedule in Part I - General Terms and Conditions A.1.c.

V. Testing Requirements

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:

1.a Emission Limitation:

3.98 lbs VOC/hr, as a monthly average

Applicable Compliance Method:

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

$$ER = [(U \times \text{VOC}) / \text{OH}] (\text{SF})$$

where,

ER = the average hourly VOC emission rate

U = the maximum monthly usage of solvent containing cleaning agent (375.164 gal)

VOC = the VOC content of the solvent containing cleaning agent (7.18 lbs/gal)

OH = the monthly operating hours (744 hrs)

SF = the safety factor of 110%

Compliance with the hourly VOC emissions limitations shall be demonstrated through the record keeping in Section A.III.2.

V. Testing Requirements (continued)

1.b Emission Limitation:

17.43 tons VOC per year

Applicable Compliance Method:

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

$$E_{ann} = ER \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

E_{ann} = the annual VOC emission rate

ER = the average hourly VOC emission rate

Compliance with the annual VOC emissions limitations shall be demonstrated through compliance with the average hourly emission limitation per the record keeping in Section A.III.2.

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

VI. Miscellaneous Requirements

None

B. State 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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Wash-02 (L003)

Activity Description: Vacuum Parts Washer w/ Solvent Recovery Distillation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L003 - WASH-02: includes vacuum parts washer with solvent recovery distillation	OAC rule 3745-31-05(A)(3) (PTI 05-13647) OAC rule 3745-21-09(O)(4)	Volatile organic compound (VOC) emissions shall not exceed 3.98 pounds per hour, as a monthly average, and 17.43 tons per year. See Operational Restrictions in Sections A.II.1., A.II.2., A.II.3., A.II.4. and A.II.5.

2. Additional Terms and Conditions

- 2.a The annual VOC emissions limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The vacuum parts washer shall employ a sufficient drain time to prevent cleaned parts from carrying out solvent liquid or vapor.
2. The permittee shall operate and maintain a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
3. The permittee shall operate and maintain a distillation system for the vacuum parts washer. The distillation system shall be operated at all times except during maintenance.
4. The vacuum parts washer shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. maintain the system as a closed loop system;
 - b. provide downtime covers for closing off the entrance and exit during shutdown hours;
 - c. minimize carry-out emissions by:
 - i. racking parts so that solvent drains freely from parts and is not trapped;
 - ii. store waste solvent only in covered containers; and
 - iii. repair solvent leaks immediately, or shut down the degreaser;
 - d. place downtime covers over entrances and exits of the vacuum parts washer at all times when the conveyors and exhausts are not being operated; and
 - e. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ any halogenated solvents within this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. the types of solvents employed in the vacuum parts washer;
 - b. whether or not the solvent employed is a halogenated solvent; and
 - c. all control equipment maintenance.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the volume of solvent containing cleaning agent employed, i.e., the sum of the volume of solvent within the parts washer at the beginning of the month and the volume of solvent added during the month subtracted from the volume of solvent remaining at the end of the month;
 - b. the VOC emissions, i.e., the volume of the solvent containing cleaning agent employed (from a. above) multiplied by the VOC content of the agent, and finally multiplied by a safety factor of 110%;
 - c. the number of hours the vacuum parts washer operated; and
 - d. the average hourly emission rate, i.e., the monthly VOC emissions (from b. above) divided by the number of hours operated (from c. above).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. average hourly VOC emissions limitation of 3.98 lbs; and
 - b. the use of halogenated solvents.

These reports shall be submitted in accordance with the schedule in Part I - General Terms and Conditions A.1.c.

V. Testing Requirements

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:

1.a Emission Limitation:

3.98 lbs VOC/hr, as a monthly average

Applicable Compliance Method:

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

$$ER = [(U \times \text{VOC}) / \text{OH}] (\text{SF})$$

where,

ER = the average hourly VOC emission rate

U = the maximum monthly usage of solvent containing cleaning agent (375.164 gal)

VOC = the VOC content of the solvent containing cleaning agent (7.18 lbs/gal)

OH = the monthly operating hours (744 hrs)

SF = the safety factor of 110%

Compliance with the hourly VOC emissions limitations shall be demonstrated through the record keeping in Section A.III.2.

V. Testing Requirements (continued)

1.b Emission Limitation:

17.43 tons VOC per year

Applicable Compliance Method:

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

$$E_{ann} = ER \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

E_{ann} = the annual VOC emission rate

ER = the average hourly VOC emission rate

Compliance with the annual VOC emissions limitations shall be demonstrated through compliance with the average hourly emission limitation per the record keeping in Section A.III.2.

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

VI. Miscellaneous Requirements

None

B. State 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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Wash-03 (L004)

Activity Description: Vacuum Parts Washer w/ Solvent Recovery Distillation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L004 - WASH-03: includes vacuum parts washer with solvent recovery distillation	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	Volatile organic compound (VOC) emissions shall not exceed 3.98 pounds per hour, as a monthly average, and 17.43 tons per year. See Operational Restrictions in Sections A.II.1., A.II.2., A.II.3., A.II.4. and A.II.5.
	OAC rule 3745-21-09(O)(4)	

2. Additional Terms and Conditions

- 2.a The annual VOC emissions limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The vacuum parts washer shall employ a sufficient drain time to prevent cleaned parts from carrying out solvent liquid or vapor.
2. The permittee shall operate and maintain a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
3. The permittee shall operate and maintain a distillation system for the vacuum parts washer. The distillation system shall be operated at all times except during maintenance.
4. The vacuum parts washer shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. maintain the system as a closed loop system;
 - b. provide downtime covers for closing off the entrance and exit during shutdown hours;
 - c. minimize carry-out emissions by:
 - i. racking parts so that solvent drains freely from parts and is not trapped;
 - ii. store waste solvent only in covered containers; and
 - iii. repair solvent leaks immediately, or shut down the degreaser;
 - d. place downtime covers over entrances and exits of the vacuum parts washer at all times when the conveyors and exhausts are not being operated; and
 - e. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ any halogenated solvents within this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. the types of solvents employed in the vacuum parts washer;
 - b. whether or not the solvent employed is a halogenated solvent; and
 - c. all control equipment maintenance.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the volume of solvent containing cleaning agent employed, i.e., the sum of the volume of solvent within the parts washer at the beginning of the month and the volume of solvent added during the month subtracted from the volume of solvent remaining at the end of the month;
 - b. the VOC emissions, i.e., the volume of the solvent containing cleaning agent employed (from a. above) multiplied by the VOC content of the agent, and finally multiplied by a safety factor of 110%;
 - c. the number of hours the vacuum parts washer operated; and
 - d. the average hourly emission rate, i.e., the monthly VOC emissions (from b. above) divided by the number of hours operated (from c. above).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. average hourly VOC emissions limitation of 3.98 lbs; and
 - b. the use of halogenated solvents.

These reports shall be submitted in accordance with the schedule in Part I - General Terms and Conditions A.1.c.

V. Testing Requirements

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:

1.a Emission Limitation:

3.98 lbs VOC/hr, as a monthly average

Applicable Compliance Method:

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

$$ER = [(U \times \text{VOC}) / \text{OH}] (\text{SF})$$

where,

ER = the average hourly VOC emission rate

U = the maximum monthly usage of solvent containing cleaning agent (375.164 gal)

VOC = the VOC content of the solvent containing cleaning agent (7.18 lbs/gal)

OH = the monthly operating hours (744 hrs)

SF = the safety factor of 110%

Compliance with the hourly VOC emissions limitations shall be demonstrated through the record keeping in Section A.III.2.

V. Testing Requirements (continued)

1.b Emission Limitation:

17.43 tons VOC per year

Applicable Compliance Method:

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

$$E_{ann} = ER \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

E_{ann} = the annual VOC emission rate

ER = the average hourly VOC emission rate

Compliance with the annual VOC emissions limitations shall be demonstrated through compliance with the average hourly emission limitation per the record keeping in Section A.III.2.

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

VI. Miscellaneous Requirements

None

B. State 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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Wash-04 (L005)

Activity Description: Vacuum Parts Washer w/ Solvent Recovery Distillation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
L005 - WASH-04: includes vacuum parts washer with solvent recovery distillation	OAC rule 3745-31-05(A)(3) (PTI 05-13647) OAC rule 3745-21-09(O)(4)	Volatile organic compound (VOC) emissions shall not exceed 3.98 pounds per hour, as a monthly average, and 17.43 tons per year. See Operational Restrictions in Sections A.II.1., A.II.2., A.II.3., A.II.4. and A.II.5.

2. Additional Terms and Conditions

- 2.a The annual VOC emissions limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The vacuum parts washer shall employ a sufficient drain time to prevent cleaned parts from carrying out solvent liquid or vapor.
2. The permittee shall operate and maintain a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm.
3. The permittee shall operate and maintain a distillation system for the vacuum parts washer. The distillation system shall be operated at all times except during maintenance.
4. The vacuum parts washer shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. maintain the system as a closed loop system;
 - b. provide downtime covers for closing off the entrance and exit during shutdown hours;
 - c. minimize carry-out emissions by:
 - i. racking parts so that solvent drains freely from parts and is not trapped;
 - ii. store waste solvent only in covered containers; and
 - iii. repair solvent leaks immediately, or shut down the degreaser;
 - d. place downtime covers over entrances and exits of the vacuum parts washer at all times when the conveyors and exhausts are not being operated; and
 - e. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ any halogenated solvents within this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. the types of solvents employed in the vacuum parts washer;
 - b. whether or not the solvent employed is a halogenated solvent; and
 - c. all control equipment maintenance.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the volume of solvent containing cleaning agent employed, i.e., the sum of the volume of solvent within the parts washer at the beginning of the month and the volume of solvent added during the month subtracted from the volume of solvent remaining at the end of the month;
 - b. the VOC emissions, i.e., the volume of the solvent containing cleaning agent employed (from a. above) multiplied by the VOC content of the agent, and finally multiplied by a safety factor of 110%;
 - c. the number of hours the vacuum parts washer operated; and
 - d. the average hourly emission rate, i.e., the monthly VOC emissions (from b. above) divided by the number of hours operated (from c. above).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following
 - a. average hourly VOC emissions limitation of 3.98 lbs; and
 - b. the use of halogenated solvents.

These reports shall be submitted in accordance with the schedule in Part I - General Terms and Conditions A.1.c.

V. Testing Requirements

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:

- 1.a Emission Limitation:

3.98 lbs VOC/hr, as a monthly average

Applicable Compliance Method:

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

$$ER = [(U \times \text{VOC}) / \text{OH}] (\text{SF})$$

where,

ER = the average hourly VOC emission rate

U = the maximum monthly usage of solvent containing cleaning agent (375.164 gal)

VOC = the VOC content of the solvent containing cleaning agent (7.18 lbs/gal)

OH = the monthly operating hours (744 hrs)

SF = the safety factor of 110%

Compliance with the hourly VOC emissions limitations shall be demonstrated through the record keeping in Section A.III.2.

V. Testing Requirements (continued)

1.b Emission Limitation:

17.43 tons VOC per year

Applicable Compliance Method:

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

$$E_{ann} = ER \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

where,

E_{ann} = the annual VOC emission rate

ER = the average hourly VOC emission rate

Compliance with the annual VOC emissions limitations shall be demonstrated through compliance with the average hourly emission limitation per the record keeping in Section A.III.2.

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

VI. Miscellaneous Requirements

None

B. State 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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Dynamometer #1, 2 & 3 (P026)

Activity Description: Dynamometer #1, 2 & 3 w/ Thermal Oxidizer (TO installed 7/11/2005)

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>
P026 - Transmission testing dynamometers with three testing stands and controlled with a thermal oxidizer	OAC rule 3745-31-05(A)(3) (PTI 05-13775)	Particulate emissions (PE) shall not exceed 0.39 pounds per hour and 1.71 tons per year.
		Sulfur dioxide (SO ₂) emissions shall not exceed 0.29 pounds per hour and 1.27 tons per year.
		Nitrogen oxide (NO _x) emissions shall not exceed 5.55 pounds per hour and 24.31 tons per year.
		Volatile Organic compounds (VOC) emissions shall not exceed 0.98 pounds per hour and 4.29 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 16.54 pounds per hour and 72.45 tons per year.
		See Section A.I.2.a and A.I.2.e below.
	OAC rule 3745-17-07(A)	See Section A.I.2.b below.
	OAC rule 3745-17-11	See Section A.I.2.c below.
	OAC rule 3745-18-06(G)	See Section A.I.2.d below.
	OAC rule 3745-21-07(B)	See Section A.I.2.f below.

2. Additional Terms and Conditions

- The pound per hour and ton per year limitations reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

2. Additional Terms and Conditions (continued)

- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.c** The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(I), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.*
- * The only materials introduced into this process are gaseous fuels and liquid fuels that are used solely as fuels for the purpose of combustion.
- 2.d** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
- 2.e** The use of the thermal oxidizer on this emissions unit constitutes parts of BAT requirements of OAC rule 3745-31-05(A)(3).
- 2.f** On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally-approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

II. Operational Restrictions

1. The permittee shall employ only unleaded fuel when operating this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment to the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature reading immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value for the average combustion temperature within the thermal oxidizer, for all 3-hour blocks of time, when the emissions unit was in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance or the minimum average combustion temperature within the thermal oxidizer recommended by the thermal oxidizer manufacturer until such testing is completed.

This value is effective for the duration of this permit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

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

The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature, in degrees Fahrenheit, within the thermal oxidizer on a daily basis.

Whenever the monitored value for the combustion temperature deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and commendations.

2. For each day when the permittee burns a fuel other than unleaded fuel when operating this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. These reports shall be submitted in accordance with Part I, General Terms and Conditions, of this permit.
2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than unleaded fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emissions Limitations:

0.39 lb of PE/hr and 1.71 TPY PE
0.29 lb of SO₂/hr and 1.27 TPY SO₂
5.55 lbs of NO_x/hr and 24.31 TPY NO_x

Applicable Compliance Method:

The hourly PE, SO₂ and NO_x emission limitation were established as follows:

$$Er = [(EF) \times (U) \times (3 \text{ dyno stands}) + (7,000,000 \text{ Btu/hr}) \times (\text{scf}/1,020 \text{ Btu}) \times (EE)] \times (1 + SF)$$

where:

Er = the maximum hourly emission rate;
EF = the emissions factor of 0.004 lb PE/gallon, 0.003 lb SO₂/gal or 0.05 lb NO_x/gal, as applicable (Based on June 2001 emission test at HRA-O);
U = the maximum gas usage rate of 25 gallons per hour per testing dynamometer;
EE = the emission factor for natural gas combustion, 1.9 lbs PE/million scf, 0.6 lb SO₂/million scf, or 100 lbs NO_x/million scf, as applicable (from AP-42, Tables 1.4-1 and 1.4-2, revised 7/98); and
SF = the safety factor of 0.25 as proposed by Honda to account for system variability

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 5, 6, or 7, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual PE, SO₂ and NO_x emissions limitation were established by multiplying the maximum hourly emission rate for each respective pollutant by 8,760 hours per year, and then dividing the result by 2000 lbs per ton.

1.b Emissions Limitations:

0.98 lb VOC/hr and 4.29 TPY VOC

Applicable Compliance Method:

The hourly VOC emission limitation was established as follows:

$$Er = [(EF) \times (U) \times (3 \text{ dyno stands}) \times (1 - DRE) + (7,000,000 \text{ Btu/hr}) \times (\text{scf}/1,020 \text{ Btu}) \times (EE)] \times (1 + SF)$$

where:

Er = the maximum hourly VOC emission rate;
EF = the emissions factor of 0.2 lb VOC/gallon (Based on June 2001 emission test at HRA-O);
U = the maximum gas usage rate of 25 gallons per hour per testing dynamometer;
DRE = the destruction removal efficiency of the thermal oxidizer, 95% or 0.95;
EE = the emission factor for natural gas combustion, 5.5 lbs VOC/million scf (from AP-42, Table 1.4-2, revised 7/98); and
SF = the safety factor of 0.25 as proposed by Honda to account for system variability

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

The annual VOC emission limitation was established by multiplying the maximum hourly emission rate of 0.98 lb/hr by 8,760 hours per year, and then dividing the result by 2000 lbs per ton.

V. Testing Requirements (continued)

1.c Emissions Limitations:

16.54 lbs CO/hr and 72.45 TPY CO

Applicable Compliance Method:

The hourly CO emission limitation was established as follows:

$$E_r = [(EF) \times (3 \text{ dyno stands}) \times (1 - DRE)] + [(7,000,000 \text{ Btu/hr}) \times (\text{scf}/1,020 \text{ Btu}) \times (EE)]$$

where:

E_r = the maximum hourly CO emission rate;

EF = the emissions factor of 106.4 lb/hr prior to control (Based on Honda Transmission 12/21/04 emission test results for this emissions unit with 10% increase);

DRE = the destruction removal efficiency of the thermal oxidizer, 95% or 0.95; and

EE = the emission factor for natural gas combustion, 84 lbs CO/million scf (from AP-42, Table 1.4-1, revised 7/98).

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 10, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual CO emissions limitation was established by multiplying the maximum hourly emission rate of 16.54 by 8,760 hours per year, and then dividing the result by 2000 lbs per ton.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

2.a The emission testing shall be conducted within 6 months of the expiration of this permit.

2.b The emission testing shall be conducted to demonstrate compliance for allowable emissions limitations for CO and NO_x.

2.c The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for both CO and NO_x and control efficiency for CO only:

CO: Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

NO_x: Methods 1-4 and 7 or 7A of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.d The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

Facility Name: **Honda Transmission Mfg. of America Inc.**
Facility ID: **05-46-00-0101**
Emissions Unit: **Dynamometer #1, 2 & 3 (P026)**

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 1 - Carburizing Furnace (P027)
Activity Description: Heat Treat Gears

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>
P027 - Natural Gas fired CARB-1: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	<p>Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.</p> <p>Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).</p>
	OAC rule 3745-17-07(A)(1)	<p>Visible PE shall not exceed 5% opacity, as a 6-minute average.</p> <p>See Section A.I.2.a. below.</p> <p>The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-11(B)(1)	<p>The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{PER} = [\text{ERht} + (\text{NG} \times \text{EF}) + (\text{BBTU} \times 1/\text{BCONV} \times \text{EF})] \times (1 + \text{SF})$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{CER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NOx/hr and 4.64 TPY NOx

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NOx = the maximum hourly NOx emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NOx emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NOx limitation was established by multiplying the maximum hourly NOx emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 2 - Carburizing Furnace (P028)
Activity Description: Heat Treat Gears

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>
P028 - Natural Gas fired CARB-2: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.
		Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.
		Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.
		Sulfur dioxide (SO2) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.
		Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).
		Visible PE shall not exceed 5% opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)(1)	See Section A.I.2.a below. The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$PER = [ERht + (NG \times EF) + (BBTU \times 1/BCONV \times EF)] \times (1 + SF)$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$CER = [ERht + EReg + (NG \times EF)] \times (1 + SF)$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 3 - Carburizing Furnace (P029)
Activity Description: Heat Treat Gears

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>
P029 - Natural Gas fired CARB-3: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.
		Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.
		Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.
		Sulfur dioxide (SO2) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.
		Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).
	Visible PE shall not exceed 5% opacity, as a 6-minute average.	
	OAC rule 3745-17-07(A)(1)	See Section A.I.2.a below. The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$PER = [ERht + (NG \times EF) + (BBTU \times 1/BCONV \times EF)] \times (1 + SF)$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$CER = [ERht + EReg + (NG \times EF)] \times (1 + SF)$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 4 - Carburizing Furnace (P030)
Activity Description: Heat Treat Gears

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>
P030 - Natural Gas fired CARB-4: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	<p>Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.</p> <p>Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).</p>
	OAC rule 3745-17-07(A)(1)	<p>Visible PE shall not exceed 5% opacity, as a 6-minute average.</p> <p>See Section A.I.2.a below.</p> <p>The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-11(B)(1)	<p>The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{PER} = [\text{ERht} + (\text{NG} \times \text{EF}) + (\text{BBTU} \times 1/\text{BCONV} \times \text{EF})] \times (1 + \text{SF})$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{CER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 5 - Carburizing Furnace (P031)
Activity Description: Heat Treat Gears

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>
P031 - Natural Gas fired CARB-5: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	<p>Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.</p> <p>Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).</p>
	OAC rule 3745-17-07(A)(1)	<p>Visible PE shall not exceed 5% opacity, as a 6-minute average.</p> <p>See Section A.I.2.a below.</p> <p>The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
	OAC rule 3745-17-11(B)(1)	<p>The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{PER} = [\text{ERht} + (\text{NG} \times \text{EF}) + (\text{BBTU} \times 1/\text{BCONV} \times \text{EF})] \times (1 + \text{SF})$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{CER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 7 - Carburizing Furnace (P033)
Activity Description: Heat Treat Gears

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>
P033 - Natural Gas fired CARB-7: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.
		Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.
		Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.
		Sulfur dioxide (SO2) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.
		Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).
		Visible PE shall not exceed 5% opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)(1)	See Section A.I.2.a below. The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$PER = [ERht + (NG \times EF) + (BBTU \times 1/BCONV \times EF)] \times (1 + SF)$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$CER = [ERht + EReg + (NG \times EF)] \times (1 + SF)$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.f Emission Limitation

Visible particulate emissions from the roof vent(s) shall not exceed 5% percent opacity as a six-minute average.

Applicable Compliance Method

Compliance shall be determined through visible emission 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).

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
- v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
- vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Carb 8 - Carburizing Furnace (P034)
Activity Description: Heat Treat Gears

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>
P034 - CARB-8: includes drying furnace, carburizing furnace, quench tank, tempering furnace, 2-endothemic gas generators, and interlocked safety flares	OAC rule 3745-31-05(A)(3) (PTI 05-13647)	Particulate emissions (PE) shall not exceed 0.14 pound per hour and 0.61 ton per year.
		Nitrogen oxide (NOx) emissions shall not exceed 1.06 pounds per hour and 4.64 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 2.23 pounds per hour and 9.77 tons per year.
		Organic compound (OC) emissions shall not exceed 1.10 pounds per hour and 4.82 tons per year.
		Sulfur dioxide (SO2) emissions shall not exceed 0.17 pound per hour and 0.75 ton per year.
		Compliance with this rule also includes compliance with OAC rule 3745-17-07(A)(1).
		Visible PE shall not exceed 5% opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)(1)	See Section A.I.2.a below. The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a** The hourly and annual emission limitations were established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 lb PE/hr and 0.61 TPY PE

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{PER} = [\text{ERht} + (\text{NG} \times \text{EF}) + (\text{BBTU} \times 1/\text{BCONV} \times \text{EF})] \times (1 + \text{SF})$$

where,

PER = the maximum hourly PE rate;
ERht = 0.1 lb/hr, the test results from similar heat treat source on 2/9/95 at AEP;
NG = the maximum hourly combined natural gas usage, 3,700 cf;
EF = the particulate emission factor of 1.9 lb/mmcf, from AP-42, Table 1.4-2, 7/98;
BBTU = burner BTU/hr for (2) endo generators (3,554,102 BTU/hr);
BCONV = BTU to scf conversion factor (1,020 BTU/scf); and
SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual PE limitation was established by multiplying the maximum hourly PE rate, 0.14 lb/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

1.b Emission Limitation:

2.23 lbs CO/hr and 9.77 TPY CO

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{CER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

CER = the maximum hourly CO emission rate;
ERht = 1.45 lbs/hr, the test results from similar heat treat source on 3/20/03 at AEP;
EReg = 0.02 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;
NG = the hourly natural gas usage for heat treat, 3,700 cf;
EF = the CO emission factor of 84 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and
SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual CO limitation was established by multiplying the maximum hourly CO emission rate, 2.23 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.c Emission Limitation:

1.06 lbs NO_x/hr and 4.64 TPY NO_x

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{NER} = [(\text{ERht} + \text{EReg}) \times \text{SF}] + (\text{NG} \times \text{EF})$$

where:

NO_x = the maximum hourly NO_x emission rate;

ERht = 0.22 lb/hr, the test results from similar heat treat source on 08/17/04 at Trutec;

EReg = 0.01 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat 3,700 cf;

EF = the NO_x emission factor of 100 lb/mmcf, from AP-42, Table 1.4-1, 7/98; and

SF = the assumed safety factor based upon size of unit compared to size of tested unit, 3.0

If required, the permittee shall demonstrate compliance with the hourly NO_x emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7 as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual NO_x limitation was established by multiplying the maximum hourly NO_x emission rate, 1.06 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton. the result by 2000 lbs per ton.

1.d Emission Limitation:

1.1 lbs OC/hr and 4.82 TPY OC

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{OER} = [\text{ERht} + \text{EReg} + (\text{NG} \times \text{EF})] \times (1 + \text{SF})$$

where:

OER = the maximum hourly OC emission rate;

ERht = 0.8 lb/hr, the test results from similar heat treat source on 3/20/03 at AEP;

EReg = 0.06 lb/hr, the test results from similar endothermic generation source on 10/24/01 at AEP;

NG = the hourly natural gas usage of heat treat, 3,700 cf;

EF = the OC emission factor of 5.5 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25.

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18 or 25, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual OC limitation was established by multiplying the maximum hourly OC emission rate, 1.1 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

V. Testing Requirements (continued)

1.e Emission Limitation:

0.17 lbs SO₂/hr and 0.75 TPY SO₂

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$SER = [ER_{ht} + ER_{eg} + (NG \times EF)] \times (1 + SF)$$

where:

SO₂ = the maximum hourly SO₂ emission rate;

ER_{ht} = 0.07 lb/hr, the test results from similar heat treat source on 7/23/03 at Trutech;

ER_{eg} = 0.06 lb/hr, the test results from similar endothermic generator source on 10/24/01 at AEP;

NG = the hourly natural gas usage for heat treat, 3,700 cf;;

EF = the SO₂ emission factor of 0.6 lbs/mmcf, from AP-42, Table 1.4-2, 7/98; and

SF = the assumed safety factor for variability error of 0.25

If required, the permittee shall demonstrate compliance with the hourly SO₂ emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA

The annual SO₂ limitation was established by multiplying the maximum hourly SO₂ emission rate, 0.17 lbs/hr, by the maximum hours per year, 8,760 hours, and dividing the result by 2000 lbs/ton.

2. When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:
 - 2.a The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.
 - 2.b The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
 - v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NO_x emissions);
 - vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions); and
- Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- 2.c The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.
 3. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

Facility Name: **Honda Transmission Mfg. of America Inc.**

Facility ID: **05-46-00-0101**

Emissions Unit: **Carb 8 - Carburizing Furnace (P034)**

V. Testing Requirements (continued)

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

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>
---	---	--

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

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 2000 Ton Cutting & Forging Press (P036)

Activity Description: Billet Cutting, Hot Forging, Heating & Normalizing Gears

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Billet Cutting, Hot Forging, Heating & Normalizing Gears	OAC rule 3745-31-05(C) and PTI 05-14392 (state-only)	The particulate emissions (PE) including 1.47 tons based upon a rolling, 12-month summation of the all materials employed in this emissions unit.
		The organic compound (OC) including 4.4 tons based upon a rolling, 12-month summation of the all materials employed in this emissions unit.
	OAC rule 3745-21-07(G)(2)	See Section A.2.a. The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.
	OAC rule 3745-17-07(A)(1)	See A.II.2.c, A.III.1., A.IV.1, and A.V.3. Visible PE emissions from this emissions shall not exceed 20% opacity, as a 6-minute average.
	OAC rule 3745-17-11(B)(1)	The PE emissions shall not exceed 10.7 lbs per hour.
	OAC rule 3745-31-05(A)(3)(b)	See Section A.2.b.

2. Additional Terms and Conditions

- 2.a** The emissions limits under OAC rule 3745-31-05(C) are at potential to emit.
- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate or VOC emissions from this air contaminant emissions unit since the calculated maximum potential annual particulate emission rate is less than ten tons per year taking into account the data submitted by Honda of American.

2. Additional Terms and Conditions (continued)

- 2.c** On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally-approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to assure compliance with any and all requirements of the revised OAC rule and/or SIP.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This facility shall maintain the following daily records if any material employed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM", are used in this emissions unit:
 - a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed, in gallons;
 - b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed, in lbs/gal;
 - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed, in lbs of OC/day ("a" x "b");
 - d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was operated, in hours/day; and
 - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate, in lbs of OC/hr ("c"/"d").

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for that identify each exceedance of the following:
 - a. the average hourly OC emissions exceed 8 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials; and/or
 - b. the daily OC emissions exceed 40 pounds from the use of defined "PRM" or contains a substance that is by definition "PRM" materials.

The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Sections A.I.1 and A.II shall be determined in accordance with the following methods:

a. Emission Limitation: 1.47 tons PE/yr

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$\text{AER} = (((\text{Et} \times \text{Mf}) \times 60 \text{ min/hr}) / 7000 \text{ grains/lb}) \times (1 - 70\%) \times \text{Ho} / 2000 \text{ lbs/ton}$$

where:

AER= Annual Emission Rate;

Er = Emission Rate, (assumed worst case based on 0.01 grains per dscf);

Mf = Maximum Air Flow, in scfm, (13,000); and

Ho= Total 12-month rolling period hours of operation, (8760 hrs/yr).

2. Compliance with the emission limitation(s) and operational restriction specified in Sections A.I.1 and A.II shall be determined in accordance with the following methods:

a. Emission Limitation: 4.4 tons OC/yr

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$\text{AER} = ((\text{Mlu} \times \text{Ld} \times \text{Oc}) \times 365 \text{ days/yr}) / 2000$$

where:

AER= Annual Emission Rate;

Mlu= Maximum potential daily lubricant usage rate, (25 gallons/day, Honda Transmission's Emissions Unit Category form);

Ld= Lubricant density, (9.66 lbs/gal, Honda Transmission's provided Data sheets); and

Oc= Worst case organic compound content, (Organic content 10% by wgt., Honda Transmission's Data sheets).

3. Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section A.III.1.

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>
---	---	--

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

None

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Honda Transmission Mfg., of America Inc.
Premise Number	0546000101
What makes this facility a Title V facility?	This facility is a major facility for organic compound (OC) and carbon monoxides
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	None
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	None
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	None
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	None

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
none			

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L002 - WASH-01: includes vacuum parts washer with solvent recovery distillation	3.98 pounds of VOC per hour, as based on a monthly average.	31-05(A)(3)							y		y		y		
	17.43 tons per year.												y		Maximum based on hourly, average monthly, multiplied by 8760 hours/year.
	sufficient drain to prevent carrying out of solvent	21-09(O)(4)				y			y						Compliance based on hourly VOC emission limit and record keeping and facility compliance inspection results.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L002 - WASH-01: includes vacuum parts washer with solvent recovery distillation	operate and maintain a device which shuts off the sump heat if the coolant is either not circulating or too warm.	21-09(O)(4)				y			y						
	operate and maintain a distillation system for the vacuum parts washer				y			y							
	operated and maintained in accordance to minimize solvent evaporation from the unit				y			y							
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L003 - WASH-02	3.98 pounds of VOC per hour, as based on a monthly average.	31-05(A)(3)							y		y		y		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L003 - WASH-02	17.43 tons per year.	31-05(A)(3)											y		Maximum based on hourly, average monthly, multiplied by 8760 hours/year.
	operate and maintain a device which shuts off the sump heat if the coolant is either not circulating or too warm.	21-09(O)(4)				y			y						
	operate and maintain a distillation system for the vacuum parts washer					y			y						
	operated and maintained in accordance to minimize solvent evaporation from the unit					y			y						

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L004 - WASH-03	3.98 pounds of VOC per hour, as based on a monthly average.	31-05(A)(3)							y		y		y		
	17.43 tons per year.												y		Maximum based on hourly, average monthly, multiplied by 8760 hours/year.
	sufficient drain to prevent carrying out of solvent	21-09(O)(4)				y			y						Compliance based on hourly VOC emission limit and record keeping and facility compliance inspection results.
	operate and maintain a device which shuts off the sump heat if the coolant is either not circulating or too warm.					y			y						
	operate and maintain a distillation system for the vacuum parts washer					y			y						
	operated and maintained in accordance to minimize solvent evaporation from the unit					y			y						

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
L005 - WASH-04	3.98 pounds of VOC per hour, as based on a monthly average.	31-05(A)(3)							y		y		y		
	17.43 tons per year.												y		Maximum based on hourly, average monthly, multiplied by 8760 hours/year.
	sufficient drain to prevent carrying out of solvent	21-09(O)(4)													Compliance based on hourly VOC emission limit and record keeping and facility compliance inspection results.
	operate and maintain a device which shuts off the sump heat if the coolant is either not circulating or too warm.					y			y						
	operate and maintain a distillation system for the vacuum parts washer					y			y						
	operated and maintained in accordance to minimize solvent evaporation from the unit					y			y						

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P035 - CARB-9:	hourly emissions shall not exceed: 0.39 lbs PE; 0.29 lbs SO ₂ ; 5.55 lbs NO _x ; 0.98 lbs VOC; and 16.54 lbs CO.	31-05(A)(3)											y		Based on maximum potential fuel usage.
	Visible PE shall not exceed 5% opacity, as a 6-minute average.												y		

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.