

Statement of Basis For Title V Permit

Part I - General	
Company Name	Honda of America Mfg., East Liberty, Ohio Automobile Assembly Plant
Premise Number	0546000117
What makes this facility a Title V facility?	This facility is a major facility for volatile organic compound (VOC) and triggers MACT thresholds for HAP's
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.	Yes, emissions units K007 and K008 share a common control. This revision is to allow Honda to remove the incinerators controlling these two emissions units as well as the incinerator controlling emissions unit K015, the Plastic Bumper Coating line. Due to changes in operation and better understanding of emissions, since their initial installation, the allowable (potential) emissions from these emissions units will not change.
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)	Due to the removal of the incinerators controlling emissions units K007, K008, and K015, the record keeping for these emissions units will need to be modified. Permit to Install (PTI) 05-07923, which determines the Best Available Technology (BAT) as required by Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), for emissions units K007 and K008, on-line repair paint lines, has been modified to address these changes and to assure federally enforceable limitations are maintained. PTI 05-10278, which covers emissions unit K015, Plastic Bumper Coating, has also been modified. A number of the other emissions units record keeping requirements were changed also to better address the existing requirements in their PTI's.
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		<u>Comments</u>
	SIP (3745-)	Other	
<p>The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following:</p> <p>a. 1500 million cubic feet of natural gas, as a rolling, 12-month summation;</p> <p>b. 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and</p> <p>c. 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.</p>	3745-31-05(A)(3) in PTI 05-07923		
<p>The permittee shall maintain monthly records of the following information for the facility:</p> <p>a. the natural gas usage, in million cubic feet;</p> <p>b. the No. 2 fuel oil usage, in gallons;</p> <p>c. the percent sulfur content, by weight, for the No. 2 fuel oil employed;</p> <p>d. the rolling, 12-month summation of the monthly natural gas usage rates; and</p> <p>e. the rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.</p>	3745-31-05(A)(3) in PTI 05-07923		

<p>For each shipment of oil received for burning, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content. A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.</p> <p>The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.</p>	<p>3745-31-05(A)(3) in PTI 05-07923</p>		
<p>The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage limitation of 1500 million cubic feet, the rolling, 12-month No. 2 fuel oil usage limitation of 1.0 million gallons, and/or the No. 2 fuel oil sulfur content limitation of 0.5%, by weight. These reports shall be due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.</p>	<p>3745-31-05(A)(3) in PTI 05-07923 and PTI 05-03835</p>		

<p>Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):</p> <p>a. Sulfur Content Limitation: 0.5%, by weight sulfur content</p> <p>Applicable Compliance Method:</p> <p>The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in sections II.A.3. and 4. above.</p> <p>b. Operational Restrictions: 1500 million cubic feet of natural gas/rolling, 12-month summation 1.0 million gallons of no. 2 fuel oil/rolling, 12-month summation</p> <p>Applicable Compliance Method: The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in sections II.A.2. above.</p>	<p>3745-31-05(A)(3) in PTI 05-07923</p>		
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<p>The following insignificant emissions units are located at this facility:</p> <p>B001 - No. 1 steam boiler (exempt per OAC rule 3745-31-03); B002 - No. 2 steam boiler (exempt per OAC rule 3745-31-03); B003 - No. 3 steam boiler (exempt per OAC rule 3745-31-03); B007 - air handler No. 25 (PTI 05-10022, issued 5/19/99); B409 - emergency generator #3 (exempt per OAC rule 3745-31-03); G001 - AF gasoline/diesel dispensing (exempt per OAC rule 3745-31-03); G002 - AQ gasoline dispensing (exempt per OAC rule 3745-31-03); K018 - WE rust prevention (PTI 05-7914, issued on 7/24/96); P001 - pretreatment/phosphate process (PTI 05-7923, issued 4/17/96); P002 - body line paint effluent system (PTI 05-7923, issued 4/17/96); P003 - EDP sanding (PTI 05-7923, issued 4/17/96); P004 - surfacer sanding (PTI 05-7923, issued 4/17/96); P006 - process welding and related operations (PTI 05-7923, issued 4/17/96); P014 - on-line repair sanding (PTI 05-7923, issued 4/17/96); P015 - final inspection dynamometer (PTI 05-10022, issued 4/26/00); P016 - topcoat inspection sanding (PTI 05-7923, issued 4/17/96); P017 - inspection sanding (PTI 05-7923, issued 4/17/96); P018 - WE sealer wipe (PTI</p>	<p>OAC rules 3745-77-01(U), and 3745-31-03.</p>		
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<p>Z001 - No. 4 steam boiler (exempt per OAC rule 3745-31-03); Z005 - PA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03); Z006 - fire pump No. 1 (exempt per OAC rule 3745-31-03); Z007 - fire pump No. 2 (exempt per OAC rule 3745-31-03); Z008 - emergency generator No. 1 (exempt per OAC rule 3745-31-03); Z014 - ST cold cleaner (exempt per OAC rule 3745-31-03); Z018 - Bonderite storage tank (exempt per OAC rule 3745-31-03); Z019 - muriatic acid storage tank (exempt per OAC rule 3745-31-03); Z023 - air handler No. 24 (exempt per OAC rule 3745-31-03); Z025 - air handler No. 26 (exempt per OAC rule 3745-31-03); Z026 - air handler No. 27 (exempt per OAC rule 3745-31-03); Z036 - generator No. 2 (exempt per OAC rule 3745-31-03); Z045 - AQ portable refrigerant recovery system(exempt per OAC rule 3745-31-03); Z050 - dock door heater #14 (exempt per OAC rule 3745-31-03); Z051 - MOS cold cleaner (exempt per OAC rule 3745-31-03); Z052 - MS parts washer (exempt per OAC rule 3745-31-03); Z071 - PA cold cleaner - final repair (exempt per OAC rule 3745-31-03); Z073 - PA cold cleaner - final repair (exempt per OAC rule 3745-31-03); Z079 - PA cold cleaner - cavity wax booth/inner (exempt per OAC rule 3745-31-03);</p>			
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Z084 - PA cold cleaner - clearcoat B booth/interior check (exempt per OAC rule 3745-31-03); Z088 - PA cold cleaner - basecoat B booth/operating area (exempt per OAC rule 3745-31-03); Z089 - PA cold cleaner - basecoat A booth/operating area (exempt per OAC rule 3745-31-03); Z090 - PA cold cleaner - clearcoat A booth/interior check (exempt per OAC rule 3745-31-03); Z094 - PA cold cleaner - primer booth/interior check (exempt per OAC rule 3745-31-03); Z099 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03); Z100 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);			
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<p>Z101 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03); Z102 - PA cold cleaner - maintenance oil storage (exempt per OAC rule 3745-31-03); Z103 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03); Z104 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03); Z106 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03); Z107 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03); Z115 - cold cleaner - AF maintenance cage (exempt per OAC rule 3745-31-03); Z119 - cold cleaner 1 - maintenance cage (exempt per OAC rule 3745-31-03); Z120 - cold cleaner 2 - maintenance cage (exempt per OAC rule 3745-31-03); Z121 - cold cleaner 3 - maintenance cage (exempt per OAC rule 3745-31-03); Z122 - cold cleaner 1 - paint mix room (exempt per OAC rule 3745-31-03); Z123 - cold cleaner 2 - paint mix room (exempt per OAC rule 3745-31-03); Z124 - AQ cold cleaner - shop area (exempt per OAC rule 3745-31-03); Z125 - cold cleaner - paint OTP maintenance cage (exempt per OAC rule 3745-31-03); Z126 - cold cleaner - MPW cage (exempt per OAC rule 3745-31-03); Z127 - paint gun washer and recycler (exempt per OAC rule</p>			
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<p>Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.</p>			
<p>The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached):</p> <p>K015; and P020</p> <p>All of the requirements of Subpart PPPP are specified in Attachment A. Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart PPPP (which is only available in PDF format) into Part II of this Title V permit was not possible. Numerous difficulties were encountered in attempting to copy and paste from a PDF format into STARS format.</p>	<p>40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached)</p>		

<p>The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart IIII--Automobile and Light-Duty Truck Surface Coating (see attached):</p> <p>K001; K002; K003; K005; K006; K007; K008; K009; K011; K012; K013; and K024.</p> <p>All of the requirements of Subpart PPPP are specified in Attachment A. Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart PPPP (which is only available in PDF format) into Part II of this Title V permit was not possible. Numerous difficulties were encountered in attempting to copy and paste from a PDF format into STARS format.</p>	<p>40 CFR, Part 63, Subpart IIII--Auto mobile and Light-Du ty Truck Surface Coating</p>		
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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														
B004	0.6 tons of PE/yr	31-05(A)(3)				y			y		y						
	4.65 tons of CO/yr					y			y		y						
	5.54 tons of NOx/yr					y			y		y						
	0.02 lbs of PE/MMBTU	17-10(B)(1)			y												
	20% opacity	17-07			y	y											
	1.6 lbs of SO2/MMBTU	18-06(D)			y	y			y		y						
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments		
		SIP (3745-)	Other														
B005	0.6 tons of PE/yr	31-05(A)(3)				y			y		y						
	4.65 tons of CO/yr					y			y		y						
	5.54 tons of NOx/yr					y			y		y						
	0.02 lbs of PE/MMBTU	17-10(B)(1)			y												
	20% opacity	17-07			y	y											
	1.6 lbs of SO2/MMBTU	18-06(D)			y	y			y		y						

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B006	0.6 tons of PE/yr	31-05(A)(3)				y			y		y				
	4.65 tons of CO/yr					y			y		y				
	5.54 tons of NOx/yr					y			y		y				
	0.02 lbs of PE/MMBTU	17-10(B)(1)			y										
	20% opacity	17-07			y	y									
	1.6 lbs of SO2/MMBTU	18-06(D)			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B035	0.6 lbs of VOC/hr	31-05(A)(3)													Hourly limits are based on maximum potential. So there are not record keeping requirements on hourly limits.
	24.0 lbs of NOx/hr														
	6.4 lbs of CO/hr														
	0.5 lbs of PE/hr														
	3.8 lbs of SO2/hr														
	0.15 tons of VOC/yr	31-05(C)			y	y									Annual limitations are based on a 500 hr/rolling 12-month operational limitation and above maximum potential hourly emission rates.
	6.0 tons of NOx/yr				y	y									
	1.59 tons of CO/yr				y	y									

	0.68 tons of PE/yr				y	y										
	0.95 tons of SO2/yr				y	y										
	0.062 lbs of PE/MMBTU	17-11(B)(5)(b)			y											
	20% opacity	17-07			y	y										
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
B036	0.7 lbs of VOC/hr	31-05(A)(3)														Hourly limits are based on maximum potential. So there are not record keeping requirements on hourly limits.
	28.5 lbs of NOx/hr															
	7.64 lbs of CO/hr															
	0.6 lbs of PE/hr															
	4.5 lbs of SO2/hr															
	0.18 tons of VOC/yr	31-05(C)			y	y										Annual limitations are based on a 500 hr/rolling 12-month operational limitation and above maximum potential hourly emission rates.
	7.1 tons of NOx/yr				y	y										
	1.9 tons of CO/yr				y	y										
	0.2 tons of PE/yr				y	y										
	1.13 tons of SO2/yr				y	y										

	0.062 lbs of PE/MMBTU	17-11(B)(5)(b)			y											
	20% opacity	17-07			y	y										
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
F096	23.22 tons of PE/yr	31-05(A)(3)														
	5.25 tons of PM10/yr															
	< or = 1 min./hr visible emissions paved					y			y						Monitoring on visible emissions and cleanup procedures	
	< or = 3 min./hr visible emissions unpaved					y			y							
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
K001	0.52 lbs of VOC/ gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM	
	thermal incinerator				y	y			y		y	y			90% destruction efficiency	
	23.25 lbs of VOC/hr															Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth															combined VOC emissions not including cleanup from K001-K003, and K005-K012

	103.3 tons of VOC/12mth														combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017	
	20% opacity	17-07(A)										y			if required Method 9	
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y			y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
K002	3.0 lbs/gal, excluding water and exempt solvents	31-05(A)(3)			y	y										OAC rule 3745-21-09(U)
	thermal incinerator				y	y				y	y	y				90% destruction efficiency
	14.1 lbs of VOC/hr															Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth															combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth															combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility		40 CFR Part 63 Subpart IIII			y	y				y		y			
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													

K003	3.0 lbs/gal, excluding water and exempt solvents	31-05(A)(3)			y	y			y		y				OAC rule 3745-21-09(U)
	thermal incinerator				y	y			y	y	y				90% destruction efficiency
	14.1 lbs of VOC/hr														Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth					y			y		y				combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth					y			y		y				combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K005	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	15.1 lbs of VOC/gal of applied solids														OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	thermal incinerator				y	y				y	y	y			90% destruction efficiency
	214.64 lbs of VOC/hr														Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth						y			y		y			combined VOC emissions not including cleanup from K001-K003, and K005-K012

	103.3 tons of VOC/12mth					y			y		y				combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017	
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y					
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>	
		SIP (3745-)	Other													
K006	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012	
	15.1 lbs of VOC/gal of applied solids															OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	thermal incinerator				y	y				y	y	y				90% destruction efficiency
	214.64 lbs of VOC/hr															Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth						y			y		y				combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth						y				y		y			
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y				y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>	
		SIP (3745-)	Other													

K007	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	15.1 lbs of VOC/gal of applied solids					y			y		y				OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	1.42 lbs/gallon of applied solids.					y			y		y				as a monthly volume-weighted average of all primers employed in this emissions unit
	89.3 lbs of VOC/hr														Based on maximum potential hourly rate, so no hourly records are required.
	1.9 lbs per gallon of coating primer.					y			y		y				excluding water and exempt solvents.
	1,268.65 tons of VOC/12mth					y			y		y				combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth					y			y		y				combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K008	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012

	15.1 lbs of VOC/gal of applied solids				y			y		y					OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	1.42 lbs/gallon of applied solids.				y			y		y					as a monthly volume-weighted average of all primers employed in this emissions unit
	8.7 lbs of VOC/hr														Based on maximum potential hourly rate, so no hourly records are required.
	1.9 lbs per gallon of coating primer.				y			y		y					excluding water and exempt solvents.
	1,268.65 tons of VOC/12mth				y			y		y					combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth				y			y		y					combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K009	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y				y		y			40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	15.1 lbs of VOC/gal of applied solids				y	y				y		y			OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	5.32 lbs per gallon of coating				y	y				y		y			excluding topcoats employed, as based a monthly volume weighted average, excluding water and exempt solvents.

	thermal incinerator				y	y				y	y	y				90% destruction efficiency	
	87.2 lbs of VOC/hr															Based on maximum potential hourly rate, so no hourly records are required.	
	1,268.65 tons of VOC/12mth					y				y		y				combined VOC emissions not including cleanup from K001-K003, and K005-K012	
	103.3 tons of VOC/12mth					y				y		y				combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017	
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y				y		y					
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments		
		SIP (3745-)	Other														
K011	4.8 lbs of VOC per gallon of coating	31-05(A)(3)			y	y				y		y				as based a monthly volume weighted average, excluding water and exempt solvents	
	thermal incinerator				y	y				y		y				90% destruction efficiency	
	15.8 lbs of VOC/hr																Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth						y				y		y				combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth						y				y		y				combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y					y		y				

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K012	12.27 lbs of VOC/gal of applied solids	31-05(A)(3)			y	y			y		y				40 CFR Part 60 Subpart MM, monthly volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	15.1 lbs of VOC/gal of applied solids				y	y			y		y				OAC rule 3745-21-09(C)(1)(c), daily volume weighted average from all topcoats employed in emissions units K005-K009, and K012
	thermal incinerator				y	y			y	y	y				90% destruction efficiency
	17.4 lbs of VOC/hr														Based on maximum potential hourly rate, so no hourly records are required.
	1,268.65 tons of VOC/12mth					y				y		y			combined VOC emissions not including cleanup from K001-K003, and K005-K012
	103.3 tons of VOC/12mth					y				y		y			combined VOC emissions from cleanup from K001-K003, K005-K012, P001, P003-P005, P014, P016, & P017
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K013	1.42 lbs/gallon of applied solids.	31-05(A)(3)			y	y			y		y				as a monthly volume-weighted average of all primers employed in this emissions unit
	19.6 lbsof VOC/hr														Based on maximum potential hourly rate, of all coatings employed
	5.8 pounds per hour														

	29.2 tons /12mth.	31-05(C)				y			y		y				from all coatings employed
	9.98 tons/12mth.					y			y		y				
	1.1 lbs of HAP(s)/ gal. of solids throughout facility	40 CFR Part 63 Subpart IIII			y	y			y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K015	3512 lbs VOC/day	31-05(A)(3)													Based on maximum potential daily emission rate.
	172 lbs PM/day														Based on maximum potential daily emission rate.
	188 tons VOC/12mth	31-05(C)				y			y		y				
	8.64 tons of PM /12mth					y			y		y				
	0.26 lb organic HAP emitted per lb coating solids/12mth	40 CFR Part 63 Subpart PPPP			y	y				y		y			
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K024	24.7 lbs VOC/hr	31-05(A)(3)													Based on maximum potential hourly emission rate.
	3.0 pounds per gallon					y			y		y				excluding water and exempt solvents.
	28.7 tons/12mth	31-05(C)				y			y		y				

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P020	32.88 lbs VOC/day	31-05(A)(3)														Based on maximum potential daily emission rate.
	0.74 tons/12mth	31-05(C)			y				y		y					The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	0.26 lb organic HAP emitted per lb coating solids/12mth	40 CFR Part 63 Subpart PPPP			y	y				y		y				
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P025	19.5 lbs/hr	31-05(A)(3)														Based on combined maximum potential hourly emission rate from P025, P026, and P027.
	4.82 tons/12mth	31-05(C)				y			y		y					summation for emissions units P025, P026 and P027, combined solvent use. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	3.56 tons/12mth					y			y		y					summation emissions units P025 P026 and P027, combined pellet usage
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P026	19.5 lbs/hr	31-05(A)(3)														Based on combined maximum potential hourly emission rate from P025, P026, and P027.
	4.82 tons/12mth	31-05(C)				y			y		y					summation for emissions units P025, P026 and P027, combined solvent use. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	3.56 tons/12mth					y			y		y					summation emissions units P025 P026 and P027, combined pellet usage

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P027	19.5 lbs/hr	31-05(A)(3)														Based on combined maximum potential hourly emission rate from P025, P026, and P027.
	4.82 tons/12mth	31-05(C)			y			y		y						summation for emissions units P025, P026 and P027, combined solvent use. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	3.56 tons/12mth				y			y		y						summation emissions units P025 P026 and P027, combined pellet usage

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.