State of Ohio Environmental Protection Agency

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

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

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

07/31/03

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

05-46-00-0117
HONDA OF AMERICA, EAST LIBERTY PLANT
Jeff M. Waid
11000 St. Rt. 347
East Liberty, OH 43319-9407

Dear Jeff M. Waid:

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.

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 or comments concerning this draft Title V permit, please contact Southwest District Office.

Very truly yours,

Michael W. Ahern

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

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

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 07/31/03	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: 05-46-00-0117 to:

HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347
East Liberty, OH 43319-9407

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

B004 (Hot Water Boiler No. 1)
Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

B005 (Hot Water Boiler No. 2)
Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

B006 (Hot Water Boiler No. 3)
Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

F096 (Roadways and Parking Areas)
Paved and unpaved roadways and parking areas at East Liberty (ELP) and MEI

G001 (AF Gasoline/Diesel Dispensing)
Gasoline dispensing and storage. Includes a 20,000 gallon gasoline tank and a 4,000 gallon diesel fuel tank

K001 (EDP Coating Line)
E-Coat dip tanks and series of rinse stages and natural gas-fired bake oven and thermal oxidizer

K002 (Sealer/Deadener Coating Line)
Robotic and manual sealer and deadener application equipment, natural gas-fired air supply houses, bake oven and thermal oxidizer

K003 (Guidecoat Line)
Primer/Surfacer coating booths with manual and robotic application equipment, and natural gas-fired air supply houses, bake ovens and thermal oxidizer

K005 (Topcoat Coating Line A)
Topcoat coating line A with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

K006 (Topcoat Coating Line B)
Topcoat coating line B with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

K007 (Primary Topcoat On-Line Repair)
Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, bake oven, and thermal oxidizer.

K008 (Secondary Topcoat On-Line Repair)
Topcoat on-line repair coating booth, air supply hoses and thermal oxidizer.

K009 (Wax/Polish Coating Line)
Coating booths with manual wax application equipment and natural gas-fired air supply houses

K011 (Final Repair)
Coating booths and area including manual coating applicators for final off-line repair and infrared bake ovens/lamps

K012 (Specialty Topcoat Coating and On-Line Repair)
Topcoat coating and on-line repair booths, natural gas-fired air supply house, bake oven, and thermal oxidizer.

K013 (Body Primer Application)
Application of primer on metal sufaces for the installation of fixed quarter and windshield glass.

K015 (Plastic Coating Line)
Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, flash-off areas, cure oven, burners associated with air supply houses and thermal incinerator

P003 (EDP Sanding)
EDP sanding booth(s)

P004 (Surfacer Sanding)
Surfacer sanding booths

P014 (On-Line Repair Sanding)
Repair sanding booth

P015 (VQD Final Inspection Dynamometer)
Dynamometer used to conduct engine and electrical quality checks after final assembly.

P016 (Topcoat Inspection Sanding)
All body sanding

P017 (Final Repair Sanding)
Inspection sanding

P018 (WE Sealer Wipe)
Solvent-moistened rags used to wipe metal car bodies to remove weld sealer and other contaminants

P019 (Plastic Pretreatment System)
Plastic pretreatment process including spray and rinse tanks and steam heated dry-off oven

P021 (Plastic Parts Painting Miscellaneous Solvent Usage)
Miscellaneous solvent cleaning and solvent wiping of plastic parts. Solvent-moistened Rags; Used Rag Containers.

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

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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. 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))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii)

pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in

the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

8. Marketable Permit Programs

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

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

9. Reasonably Anticipated Operating Scenarios

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

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

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is

later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is

not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

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

16. Off-Permit Changes

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

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

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

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any

scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. The permittee shall operate and maintain two ambient air monitors to measure ozone. One monitor shall be operated during the ozone season (April 1 - October 31) beginning in 1997 and located in a downwind direction from the facility at a location acceptable to Ohio EPA. The second monitor shall be retained at the Transportation Research Center facility or be located near that site. The general and specific monitoring site locations must be approved by Ohio EPA, DAPC, before data are acceptable. The monitors shall be sited in accordance with 40 CFR Part 58, Appendix E. The monitors and data shall meet the quality assurance requirements of 40 CFR Part 58, Appendix B. Quality assurance data shall be submitted to Ohio EPA, DAPC, Technical Services Section, in Aerometric Information Retrieval System (AIRS) format within 45 days of the end of the calendar quarter. Ambient monitoring data shall be submitted monthly, in AIRS format, either on diskette or electronically to Ohio EPA, DAPC, Technical Services Section. The data shall arrive at Ohio EPA within 30 days of the end of the month in which it was collected. The monitoring will continue for three complete seasons, currently April 1 through October 31, of valid data.

2. The permittee shall submit quarterly quality assurance data within 45 days of the end of each calendar quarter. The permittee shall submit monitoring data each month, within 30 days of the end of the month in which the data was collected.

3. The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following:

a. 1500 million cubic feet of natural gas, as a rolling, 12-month summation;

b. 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and

c. 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.

4. The permittee shall maintain monthly records of the following information for the facility:

a. the natural gas usage, in million cubic feet;

b. the No. 2 fuel oil usage, in gallons;

c. the percent sulfur content, by weight, for the No. 2 fuel oil employed;

d. the rolling, 12-month summation of the monthly natural gas usage rates; and

e. the rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.

5. 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.

6. 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.

7. 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.

A. State and Federally Enforcable Section (continued)

8. 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):

8.a Sulfur Content Limitation:
0.5%, by weight sulfur content

Applicable Compliance Method:
The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in sections II.A.5 and 6 above.

8.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

Applicable Compliance Method:
The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in sections II.A.4 above.

B. State Only Enforceable Section

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

B001 No. 1 Steam Boiler
B002 No. 2 Steam Boiler
B003 No. 3 Steam Boiler
G002 AQ Gasoline Dispensing Operation
K017 ST Rust Prevention
K018 WE Rust Prevention
P001 Pretreatment/Phosphate Process
P002 Body Line Paint Effluent System
P006 Process Welding and Related Operations
P020 BPA Polish
P022 Plastic Coating Paint Mix Room
P023 Stamping Transfer Press
T001 Non-volatile Material Storage Tank & Dispensing Operation
T002 Volatile Material Storage Tank & Dispensing Operation
T003 Non-volatile Material Storage Tank & Dispensing Operation
T004 Non-volatile Material Storage Tank & Dispensing Operation
T005 Non-volatile Material Storage Tank & Dispensing Operation
T006 Non-volatile Material Storage Tank & Dispensing Operation
T007 Non-volatile Material Storage Tank & Dispensing Operation
T008 Non-volatile Material Storage Tank & Dispensing Operation
T009 Non-volatile Material Storage Tank & Dispensing Operation
T010 Virgin Solvent Storage Tank
T011 Virgin Solvent Storage Tank
T012 BPA Spent Solvent Storage Tank and Loading Rack
T013 Non-voltl. Material Storage Tank & Dispensing Operation
T014 Non-voltl. Material Storage Tank & Dispensing Operation
Z001 No. 4 Steam Boiler
Z005 PA Spent Solvent Storage Tank and Loading Rack
Z006 Fire Pump No. 1
Z007 Fire Pump No. 2
Z008 Emergency Generator No. 1
Z014 ST Cold Cleaner
Z017 Accelerator 131 Storage Tank
Z018 Bonderite Storage Tank
Z019 Muriatic Acid Storage Tank
Z022 Refrigerant Pressurized Storage Tank Distn. System
Z023 Air Handler No. 24
Z025 Air Handler No. 26
Z026 Air Handler No. 27
Z027 Wastewater Treatment Plant
Z028 Water Plant Lime Silo
Z029 Paint Test Lab

B. State Only Enforceable Section (continued)

1.a

Z036 Generator No. 2
Z037 FAC Portable Generator No. 1
Z038 FAC Portable Generator No. 2
Z039 FAC Power Washer
Z043 AF Miscellaneous Lubricant Application
Z045 AQ Portable Refrigerant Recovery System
Z049 BPA Paint Mini Spray Booth
Z050 Dock Door Heater #14
Z051MOS: Cold Cleaner
Z052 MS Parts Washer
Z053 PA Accelerator 131 Storage Tank
Z054 ST MIG Welder
Z055 ST Grinding & Sanding
Z069 AQ NHV Lab
Z070 PA Cold Cleaner (Black Wax Booth)
Z071 PA Cold Cleaner (Final Repair)
Z072 PA Cold Cleaner/Gun Washer (Final Repair)
Z073 PA Cold Cleaner (Final Repair)
Z074 PA Cold Cleaner (Cavity Wax Booth/Wheelwell)
Z075 PA Cold Cleaner (Cavity Wax Booth/Inner)
Z076 PA Cold Cleaner (Cavity Wax Booth/Under)
Z077 PA Cold Cleaner (Cavity Wax Booth/Wheelwell)
Z078 PA Cold Cleaner (Cavity Wax Booth/Inner)
Z079 PA Cold Cleaner (Cavity Wax Booth/Inner)
Z080 PA Cold Cleaner (On-Line Repair Booth/Basecoat)
Z081 PA Cold Cleaner (On-Line Repair Booth /Clearcoat)
Z082 PA Cold Cleaner (On-Line Repair Booth /Clearcoat)
Z083 PA Cold Cleaner (Topcoat Inspection)
Z084 PA Cold Cleaner (Clearcoat B Booth/Interior Check)
Z085 PA Cold Cleaner (Clearcoat B Booth/Interior Check)
Z086 PA Cold Cleaner (Clearcoat B Booth/Interior Check)
Z087 PA Cold Cleaner (Clearcoat B Booth/Exterior Check)
Z088 PA Cold Cleaner (Basecoat B Booth/Operating Area)
Z089 PA Cold Cleaner (Basecoat A Booth/Operating Area)
Z090 PA Cold Cleaner (Clearcoat A Booth/Interior Check)
Z091 PA Cold Cleaner (Clearcoat A Booth/Interior Check)
Z092 PA Cold Cleaner (Clearcoat A Booth/Interior Check)
Z093 PA Cold Cleaner (Clearcoat A Booth/Exterior Check)
Z094 PA Cold Cleaner (Primer Booth/Interior Check)
Z095 PA Cold Cleaner (Primer Booth/Interior Check)
Z096 PA Cold Cleaner (Primer Booth/Exterior Check)
Z097 PA Cold Cleaner (Primer Booth/Operating Area)
Z098 PA Cold Cleaner (Primer Booth/MPW)
Z099 PA Cold Cleaner (Maintenance cage)
Z100 PA Cold Cleaner (Maintenance cage)

B. State Only Enforceable Section (continued)

Z101 PA Cold Cleaner (Maintenance cage)
Z102 PA Cold Cleaner (Maintenance oil storage)
Z103 PA Cold Cleaner (MPW Conveyor Cleaning)
Z104 PA Cold Cleaner (MPW Conveyor Cleaning)
Z105 PA Cold Cleaner (E-coat Laboratory)
Z106 PA Cold Cleaner (Paint Mix)
Z107 PA Cold Cleaner (Paint Mix)
Z108 PA Cold Cleaner (Paint Mix)
Z114 PA Conveyor Cleaning
Z115 Cold Cleaner (AF Maintenance cage)
Z116 AQ Vehicle Emission Test Lab
Z117 PA Portable Generator No. 1
Z118 TRC Gasoline Dispensing

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hot Water Boiler No. 1 (B004)

Activity Description: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
natural gas/No. 2 oil-fired 16.875 mmBtu/hr; hot water boiler No. 1 (B004)	OAC rule 3745-31-05(A)(3) (PTI # 05-3835)	0.60 ton particulate emissions (PE) per year 5.54 tons nitrogen oxides (NOx) per year 2.70 tons carbon monoxide (CO) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install No. 05-3835.

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

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

2. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) 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.

2. 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 in this emissions unit. 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.

3. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

4. The permittee shall maintain monthly records of the following information for this emissions units:

a. the amount of No. 2 fuel oil consumed, in gallons;

b. the amount of natural gas consumed, in million cubic feet;

c. the PE rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.c.i + A.III.4.c.ii, and then divide by 2000.

d. the NOx emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 50 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 10 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.d.i and A.III.4.d.ii, and then dividet by 2000.

e. the CO emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.e.i and A.III.4.e.ii, and then divide by 2000.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Sections A.III.1. and A.III.2. above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and Co emissions for this emissions unit. These reports shall be due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. 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):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity.

When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon) by the emission factor of 2.0 lbs PE/1000 gal (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity.

If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

1.b Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

1.c Emission Limitation:
1.6 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received does not exceed the limitation.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO2 emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

1.d Emission Limitation:
0.60 TPY of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month PE rates.

1.e Emission Limitation:
5.54 TPY of NOx

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month NOx emission rates..

1.f Emission Limitation:
2.70 TPY of CO

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month CO emission rates..

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Hot Water Boiler No. 2 (B005)

Activity Description: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
natural gas/No. 2 oil-fired 16.875 mmBtu/hr; hot water boiler No. 2 (B005)	OAC rule 3745-31-05(A)(3) (PTI # 05-3835)	0.60 ton particulate emissions (PE) per year 5.54 tons nitrogen oxides (NOx) per year 2.70 tons carbon monoxide (CO) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install No. 05-3835.

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

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

2. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) 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.

2. 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 in this emissions unit. 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.

3. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

4. The permittee shall maintain monthly records of the following information for this emissions units:

a. the amount of No. 2 fuel oil consumed, in gallons;

b. the amount of natural gas consumed, in million cubic feet;

c. the PE rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.c.i + A.III.4.c.ii, and then divide by 2000.

d. the NOx emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 50 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 10 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.d.i and A.III.4.d.ii, and then dividet by 2000.

e. the CO emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.e.i and A.III.4.e.ii, and then divide by 2000.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Sections A.III.1. and A.III.2. above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and Co emissions for this emissions unit. These reports shall be due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. 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):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity.

When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon) by the emission factor of 2.0 lbs PE/1000 gal (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity.

If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

1.b Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

1.c Emission Limitation:
1.6 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received does not exceed the limitation.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO2 emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

1.d Emission Limitation:
0.60 TPY of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month PE rates.

1.e Emission Limitation:
5.54 TPY of NOx

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month NOx emission rates..

1.f Emission Limitation:
2.70 TPY of CO

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month CO emission rates..

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Hot Water Boiler No. 3 (B006)

Activity Description: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
natural gas/No. 2 oil-fired 16.875 mmBtu/hr; hot water boiler No. 3 (B006)	OAC rule 3745-31-05(A)(3) (PTI # 05-3835)	0.60 ton particulate emissions (PE) per year 5.54 tons nitrogen oxides (NOx) per year 2.70 tons carbon monoxide (CO) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-18-06(D), 3745-21-08(B) and 3745-23-06(B).
	OAC rule 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06 (D)	1.6 lbs SO2/mmBtu of actual heat input.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install No. 05-3835.

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

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

2. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) 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.

2. 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 in this emissions unit. 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.

3. For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

4. The permittee shall maintain monthly records of the following information for this emissions units:

a. the amount of No. 2 fuel oil consumed, in gallons;

b. the amount of natural gas consumed, in million cubic feet;

c. the PE rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.c.i + A.III.4.c.ii, and then divide by 2000.

d. the NOx emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 50 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 10 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.d.i and A.III.4.d.ii, and then dividet by 2000.

e. the CO emission rate, in tons, calculated as follows:

i. for natural gas consumption, mulitply A.III.4.b by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);

ii. for No. 2 fuel oil consumption, multiply A.III.4.a by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and

iii. sum A.III.4.e.i and A.III.4.e.ii, and then divide by 2000.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Southwest District Office), in writing, of any record that shows a deviation of the allowable sulfur dioxide emission limitation (1.6 lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Sections A.III.1. and A.III.2. above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Southwest District Office) within 45 days after the deviation occurs.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit annual reports that summarize the actual annual PE, NOx and Co emissions for this emissions unit. These reports shall be due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. 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):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity.

When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon) by the emission factor of 2.0 lbs PE/1000 gal (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity.

If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

1.b Emission Limitation:
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

1.c Emission Limitation:
1.6 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received does not exceed the limitation.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO2 emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

1.d Emission Limitation:
0.60 TPY of PE

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month PE rates.

1.e Emission Limitation:
5.54 TPY of NOx

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month NOx emission rates..

1.f Emission Limitation:
2.70 TPY of CO

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements established in section A.III.4. of this permit and shall be the summation of the 12 calendar month CO emission rates..

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Roadways and Parking Areas (F096)

Activity Description: Paved and unpaved roadways and parking areas at East Liberty (ELP) and MEI

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved and unpaved roadways and parking areas at East Liberty Plant and MEI (See section A.I.2.a. and b.)	OAC rule 3745-31-05(A)(3) (PTI 05-8339)	26.65 tons particulate emissions (PE) per year 5.89 tons PM10 per year There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period. There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period. best available control measure that are sufficient to minimize or eliminate visible emissions of fugitive dust (See A.I.2.c, d, e, f, g, h and i.)
	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	none (See A.I.2.k.)

2. Additional Terms and Conditions

2.a The paved road segments and parking areas which are covered by this permit and which are subject to the requirements of PTI 05-8339 are listed in the sections below:

Identification/Approximate Mileage (miles):
AH, ELP Auto/ 0.76
AH, ELP Truck/ 0.76
ELP Auto/ 3.46
ELP HDD Truck/ 3.46
MEI Auto/ 2.86
MEI HDD Truck/ 2.86

2.b The unpaved road segments and parking areas which are covered by this permit and which are subject to the requirements of PTI 05-8339 are listed in the sections below:

Identification/Approximate Mileage (miles):
ELP Auto 1/ 3.45
ELP LDD Truck/ 3.45

2.c The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to sweeping the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.f The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.g Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2. Additional Terms and Conditions (continued)

2.h The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.i Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

2.j Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

2.k This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise specified in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

a. for all paved roadways and parking areas, as identified in Section A.I.2.a., the minimum inspection frequency shall be daily; and

b. for all unpaved roadways and parkinga areas, as identified in Section A.I.2.b., the minimun inspection frequency shall be daily.

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The permittee may, upon receipt of written approval from the Ohio EPA, Southwest District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii.

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 method:

1.a Emission Limitation:
There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:
If required, compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

1.b Emission Limitations:
26.65 tons/yr PE
5.89 tons/yr PM10

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual PE and PM10 limitations based on the annual maximum vehicle miles traveled and the emission factors for paved and unpaved roadways found in AP-42, Section 13.2.1.1 and section 13.2.2, respectively.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: AF Gasoline/Diesel Dispensing (G001)

Activity Description: Gasoline dispensing and storage. Includes a 20,000 gallon gasoline tank and a 4,000 gallon diesel fuel tank

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Assembly gasoline and diesel dispensing operations (G001), including a 4,000-gallon and 20,000-gallon underground storage tanks	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	9.13 tons volatile organic compound (VOC) per rolling, 12-month summation The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(R).
	OAC rule 3745-21-09(R)	Stage I vapor control - 90% control efficiency for VOCs, submerged fill See A.I.2.a.

2. Additional Terms and Conditions

2.a The permittee shall not cause, allow, or permit the transfer of gasoline to these gasoline dispensing tanks unless the following requirements are met:

i. the storage tanks are equipped with a submerged fill pipe; and

ii. for any transfer of gasoline from a delivery vessel to the storage tanks, the vapors displaced must be processed by one of the following systems:

a. a vapor balance system which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the delivery vessel and which is equipped with a means to prevent the discharge of displaced vapors from an unconnected vapor line; or

b. a vapor control system which is designed and operated to recover at least 90 percent by weight of the VOC in the displaced vapors.

II. Operational Restrictions

1. The permittee shall comply with the following operational restrictions for the Stage I vapor control system:

a. the vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline;

b. there shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers;

c. there shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline;

d. the transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank;

e. all fill caps shall be "in place" and clamped during normal storage conditions; and

f. the permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information for this emissions unit:

a. Date of inspection.

b. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).

c. Leak determination method.

d. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).

e. Inspector's name and signature.

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

a. the gasoline throughput, in gallons;

b. the VOC emission rate, in tons, calculated by multiplying the gasoline throughput, from section A.III.2.a above, by the emission factor, from AP-42, Fifth Edition, Table 5.2-7, of 13.0 lbs VOC/1000 gallons, and then dividing by 2000; and

c. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

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

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following record keeping requirements are as stringent as or more stringent than the record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1, and 2. The record keeping requirements contained in the above-references Permit to Install are subsumed into the record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. Any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director (Ohio EPA, Southwest District Office) within 30 days after the repair is completed.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 9.13 tons. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1, and 2. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 method:

Emission Limitation:
9.13 tons VOC per rolling, 12-month summation

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in section A.III.2 of this permit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: EDP Coating Line (K001)

Activity Description: E-Coat dip tanks and series of rinse stages and natural gas-fired bake oven and thermal oxidizer

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
EDP Coating Line (K001), equipped with a thermal incinerator (EDP)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	Volatile organic compound (VOC) emissions shall not exceed 0.062 Kg/liter (0.52 lb/gallon) of applied solids, as a monthly, volume-weighted average. 23.25 lbs VOC per hour See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven and the incinerator: 0.08 lb PM10/hr 0.06 lb SO2/hr 1.00 lb NOx/hr 1.00 lb CO/hr 0.06 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-21-09(C)(1), and 3745-23-06(B).
	40 CFR Part 60, Subpart MM	The VOC emission limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(C)(1)	VOC emissions shall not exceed 1.4 lbs/gallon of solids, as a daily, volume-weighted average.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-(11)(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c All the VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

[When quantifying VOC emissions from this emissions unit, the permittee may assume a 70% VOC capture efficiency. The percent capture efficiency may be adjusted if monitoring or testing provides a more accurate estimate for this emissions unit.]

2.d The 23.25 lbs VOC per hour limit was established for PTI purposes to 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 this limit.

* If at any time the capture and/or control efficiencies are determined to be less than 70% and 90%, respectively, the permittee shall take immediate steps to ensure compliance with the 23.25 lbs VOC per hour limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit-to-install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

5. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each material (coating, solvent, etc.) added to the E-coat tank.

b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-coat tank.

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-coat tank.

d. On the days when a mixture of materials are added to the dip tank, the daily, uncontrolled, volume-weighted average VOC content of all the materials added to the E-coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10.

e. On the days when a mixture of materials are added to the dip tank, the daily, controlled volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The daily, controlled VOC emission rate shall be calculated using (i) the daily, uncontrolled, volume-weighted average VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

f. On the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tank and the calculated, controlled daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of the entire tank, in pounds per gallon of solids. This shall be determined by collecting a post-material-add composite sample from the dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section A.V.3 of this permit.

6. The permittee shall collect and record the following information for each month for this emissions unit:

a. The name and identification number of each material (coating, solvent, etc.) added to the E-coat tank.

b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-coat tank.

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-coat tank.

d. The total controlled VOC emissions for all the materails employed [summation of (b x c) for all materials multiplied by (1 - the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).

e. The monthly, uncontrolled, volume-weighted average VOC content of the materials added to the E-coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10.

f. The monthly, controlled, volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The monthly, controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 6. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 0.062 kg/liter (0.52 lb/gallon) of applied solid, as a monthly, volume-weighted average; and

e. the calculated, controlled VOC emission rate of 1.4 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 4. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emissions Limitation:
0.062 Kg VOC per liter of applied solids, as a monthly, volume-weighted average (0.52 lb VOC/gallon of applied solids)

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.6. of this permit.

1.b Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.c Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.d Emission Limitation:
VOC emissions shall not exceed 1.4 lbs/gallon of solids, as a daily volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

1.e Emission Limitations:
0.08 lb PM10/hr
0.06 lb SO2/hr
1.00 lb NOx/hr
1.00 lb CO/hr
0.06 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (9,636 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.f Emission limitation:
23.25 lbs VOC/hr

Applicable Compliance Method:

Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Visible Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.h Emission Limitations-
The thermal oxidizer shall operate at a minimum VOC destruction efficiency of 90 percent, by weight.

Applicable Compliance Method-
Compliance with the VOC destruction efficiency requirements above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 2.5 years after permit issuance and within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 23.25 lbs VOC/hr; and the 90% VOC destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Sealer/Deadener Coating Line (K002)

Activity Description: Robotic and manual sealer and deadener application equipment, natural gas-fired air supply houses, bake oven and thermal oxidizer

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
robotic and manual sealer and deadener application equipment (K002), equipped with a thermal incinerator (S/D)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	The volatile organic compound (VOC) content shall not exceed 0.20 pound per gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average. 15.0 lbs VOC per hour 2.68 lbs of particulate emissions (PE) per hour, from overspay See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator : 0.21 lb PM10/hr 0.02 lb SO2/hr 2.7 lbs NOx/hr 2.23 lbs CO/hr 0.15 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-21-09(U) and 3745-23-06(B).
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the spray booth).
	OAC rule 3745-21-09(U)	3.0 lbs VOC/gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.g.
	OAC rule 3745-17-(11)(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 15.0 lbs VOC per hour limitation was established for PTI purposes to 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 this limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials 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.g The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a fabric filter control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

5. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

c. The total controlled VOC emissions, in pounds, for all the coatings employed [summation of (# of gallons for each coating (excluding water and exempt solvents) x VOC content for each coating (excluding water and exempt solvents)) for all coatings multiplied by (1 - the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance)].

d. The monthly, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the appropriate equations specified in OAC rule 3745-21-10(B).

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

6. The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. The daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equations specified in OAC rule 3745-21-10(B).

7. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

8. The permittee shall maintain records that document any time periods when the fabric filter control system serving this emissions unit was not in service while this emissions unit was operating.

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons; and

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.

4. The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any daily and/or monthly record showing that the daily and/or the monthly, volume-weighted average VOC contents exceeded the applicable limitations of 0.20 lb per gallon of coating, excluding water and exempt solvents and 3.0 lbs per gallon of coating, excluding water and exempt solvents, respectively. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office, within 45 days after the exceedance occurs.

5. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

6. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

7. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the fabric filter control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1thru 7. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emissions Limitation:
0.20 lb VOC/gallon of coating, excluding water and exempt solvent, as a monthly, volume-weighted average

3.0 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Apllicable Compliance Method:
Compliance with the mass VOC per volume of coating limitations shall be determined through the record keeping requirements established in Sections A.III.5 and 6 of this permit.

1.b Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.d Emission Limitations:
0.21 lb PM10/hr
0.02 lb SO2/hr
2.7 lbs NOx/hr
2.23 lbs CO/hr
0.15 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (26,856 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

1.e Emission limitation:
15.0 lbs VOC/hr

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

V. Testing Requirements (continued)

1.f Visible Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.g Emission Limitation:
2.68 pounds PE/hr, from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 15.0 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

V. Testing Requirements (continued)

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Guidecoat Line (K003)

Activity Description: Primer/Surfacer coating booths with manual and robotic application equipment, and natural gas-fired air supply houses, bake ovens and thermal oxidizer

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Primer/surfacer (guidecoat) coating booths (K003)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	The volatile organic compound (VOC) emissions shall not exceed 1.06 kgs/liter (8.85 lbs/gallon) of applied solids, as a daily, volume-weighted average. 149.9 lbs VOC per hour 5.4 pound of particulate emissions (PE) per hour See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.31 lb PM10/hr 0.03 lb SO2/hr 4.05 lbs NOx/hr 3.40 lb CO/hr 0.23 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).
	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart MM	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(C)(1)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OCA rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 149.9 lbs VOC per hour limitation was established for PTI purposes to 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 this limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect the potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for the guidcoat line that will enable the calculation of the VOC emission rate for this emissions unit in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in the guidcoat line, in kilograms of VOC per liter of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

5. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

a. the total number of units produced;

b. the total controlled VOC emissions, in pounds, calculated by summing the daily, controlled VOC emission rates, from section A.III.4 above, for the calendar month; and

b. the rolling, 12-month number of the units produced.

7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

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

8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 7. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.06 kgs/liter of applied solid;

e. the monthly production rate limitation of 31,000 units; and

f. the rolling, 12-month production rate limitation of 267,000 units.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permttee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
1.06 Kg VOC per liter of applied solids, as a daily, volume-weighted average (8.85 lbs VOC/gallon of applied solids)

Applicable Compliance Method:
Compliance with the mass VOC per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

1.b Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.c Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.d Emission Limitations:
0.31 lb PM10/hr
0.03 lb SO2/hr
4.05 lb NOx/hr
3.40 lb CO/hr
0.23 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.e Emission limitation:
149.9 lbs VOC/hr

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.f Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.g Emission Limitation:
5.4 pounds PE/hr, from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 149.9 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Topcoat Coating Line A (K005)

Activity Description: Topcoat coating line A with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Topcoat, coating line A (K005), equipped with a thermal incinerator (T/C A)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	214.64 lbs volatile organic compounds (VOC) per hour 10.8 pounds of particulate emissions (PE) per hour, from overspray See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.40 lb PM10/hr 0.03 lb SO2/hr 5.13 lbs NOx/hr 4.31 lb CO/hr 0.28 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

5. The permittee shall determine the monthly, controlled VOC emissions and the total coating solids deposited for this emissions unit as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

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

d. Determine the fraction of total VOC which enters the control device by using the following equation where "n" is the total number of stacks entering the control device and "p" is the total number of stacks not connected to the control device:

F*= [the summation of (Qbi x Cbi) for all stacks "n"] divided by [the summation of (Qbi x Cbi) for all stacks "n" + the summation of (Qfk x Cfk) for all stacks "p"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qfk= volumetric flow rate of the effluent gas flowing through exhaust stack (k) not entering the control device (dry standard cubic meters per hour)
Cfk= concentration of VOC (as carbon) in the effleuent gas flowing through exhaust stack (k) not entering the control device (ppm)

* Once available, the permittee shall use the capture efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

e. Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation, where "n" is the total number of stacks entering the control device and "m" is the toal number of stacks leaving the control device:

E* = [the summation of (Qbi x Cbi) for all stacks "n" - the summation of (Qaj x Caj) for all stacks "m"] divided by [the summation of (Qbi x Cbi) for all stacks "n"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qaj= volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
Caj= concentration of VOC (as carbon) in the effleuent gas flowing through stack (j) leaving the control devcice (ppm)

* Once available, the permittee shall use the destruction efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

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

f. Using the destruction efficiencies (E), from section A.III.5.e, the uncontrolled mass of VOC (Mo + Md), calculated in A.III.5.a, and the collection efficiency (F), from section A.III.5.d, calculate the controlled, mass of VOC by the following equation:

VOCc = (Mo + Md) x [1- F x E]

where:

VOCc = controlled, VOC emissions (lbs/month)
F = fraction of total VOC which is emitted by the emissions unit that enters the control device, or the collection efficiency
E = VOC destruction efficiency of the control device

6. The permittee shall calculate and maintain each month the following information for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined):

a. The total controlled, VOC emissions, in kgs, calculated by summing the controlled VOC emissions for emissions units K005, K006, K007, K008, K009* and K012.

b. The total solids deposited, in liters, calculated by summing the amounts of solids deposited for emissions units K005, K006, K007, K008, K009* and K012.

c. The monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids, in kilograms per liter (a/b).

* only the application of the topcoat (blackout) associated with this emissions unit

7. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

8. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

1.c Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.d Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.e Emission Limitations:
0.40 lb PM10/hr
0.03 lb SO2/hr
5.13 lbs NOx/hr
4.31 lb CO/hr
0.28 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.f Emission limitation:
214.64 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.h Emission Limitation:
10.8 pounds PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 216.64 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Topcoat Coating Line B (K006)

Activity Description: Topcoat coating line B with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Topcoat, coating line B (K006), equipped with a thermal incinerator (T/C B)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	214.64 lbs volatile organic compounds (VOC) per hour 10.8 pounds of particulate emissions (PE) per hour, from overspray See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.40 lb PM10/hr 0.03 lb SO2/hr 5.13 lbs NOx/hr 4.31 lb CO/hr 0.28 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

5. The permittee shall determine the monthly, controlled VOC emissions and the total coating solids deposited for this emissions unit as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

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

d. Determine the fraction of total VOC which enters the control device by using the following equation where "n" is the total number of stacks entering the control device and "p" is the total number of stacks not connected to the control device:

F*= [the summation of (Qbi x Cbi) for all stacks "n"] divided by [the summation of (Qbi x Cbi) for all stacks "n" + the summation of (Qfk x Cfk) for all stacks "p"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qfk= volumetric flow rate of the effluent gas flowing through exhaust stack (k) not entering the control device (dry standard cubic meters per hour)
Cfk= concentration of VOC (as carbon) in the effleuent gas flowing through exhaust stack (k) not entering the control device (ppm)

* Once available, the permittee shall use the capture efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

e. Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation, where "n" is the total number of stacks entering the control device and "m" is the toal number of stacks leaving the control device:

E* = [the summation of (Qbi x Cbi) for all stacks "n" - the summation of (Qaj x Caj) for all stacks "m"] divided by [the summation of (Qbi x Cbi) for all stacks "n"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qaj= volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
Caj= concentration of VOC (as carbon) in the effleuent gas flowing through stack (j) leaving the control devcice (ppm)

* Once available, the permittee shall use the destruction efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

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

f. Using the destruction efficiencies (E), from section A.III.5.e, the uncontrolled mass of VOC (Mo + Md), calculated in A.III.5.a, and the collection efficiency (F), from section A.III.5.d, calculate the controlled, mass of VOC by the following equation:

VOCc = (Mo + Md) x [1- F x E]

where:

VOCc = controlled, VOC emissions (lbs/month)
F = fraction of total VOC which is emitted by the emissions unit that enters the control device, or the collection efficiency
E = VOC destruction efficiency of the control device

6. The permittee shall calculate and maintain each month the following information for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined):

a. The total controlled, VOC emissions, in kgs, calculated by summing the controlled VOC emissions for emissions units K005, K006, K007, K008, K009* and K012.

b. The total solids deposited, in liters, calculated by summing the amounts of solids deposited for emissions units K005, K006, K007, K008, K009* and K012.

c. The monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids, in kilograms per liter (a/b).

* only the application of the topcoat (blackout) associated with this emissions unit

7. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

8. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

1.c Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.d Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.e Emission Limitations:
0.40 lb PM10/hr
0.03 lb SO2/hr
5.13 lbs NOx/hr
4.31 lb CO/hr
0.28 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.f Emission limitation:
214.64 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.h Emission Limitation:
10.8 pounds PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 216.64 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Primary Topcoat On-Line Repair (K007)

Activity Description: Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, bake oven, and thermal oxidizer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Primary topcoat on-line repair (K007), equipped with a thermal incinerator (REP)** **[The VOC emissions from emissions units K007 and K008 are controlled by the same incinerator (REP).]	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	89.3 lbs volatile organic compounds (VOC) per hour 5.19 pounds of particulate emissions (PE) per hour, from overspray See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator shall not exceed the following: 0.32 lb PM10/hr 0.025 lb SO2/hr 4.08 lbs NOx/hr 3.43 lb CO/hr 0.25 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 89.3 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2. Additional Terms and Conditions (continued)

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

5. The permittee shall determine the monthly, controlled VOC emissions and the total coating solids deposited for emissions units K007 and K008, combined, as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

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

d. Determine the fraction of total VOC which enters the control device by using the following equation where "n" is the total number of stacks entering the control device and "p" is the total number of stacks not connected to the control device:

F*= [the summation of (Qbi x Cbi) for all stacks "n"] divided by [the summation of (Qbi x Cbi) for all stacks "n" + the summation of (Qfk x Cfk) for all stacks "p"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qfk= volumetric flow rate of the effluent gas flowing through exhaust stack (k) not entering the control device (dry standard cubic meters per hour)
Cfk= concentration of VOC (as carbon) in the effleuent gas flowing through exhaust stack (k) not entering the control device (ppm)

* Once available, the permittee shall use the capture efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

e. Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation, where "n" is the total number of stacks entering the control device and "m" is the toal number of stacks leaving the control device:

E* = [the summation of (Qbi x Cbi) for all stacks "n" - the summation of (Qaj x Caj) for all stacks "m"] divided by [the summation of (Qbi x Cbi) for all stacks "n"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qaj= volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
Caj= concentration of VOC (as carbon) in the effleuent gas flowing through stack (j) leaving the control devcice (ppm)

* Once available, the permittee shall use the destruction efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

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

f. Using the destruction efficiencies (E), from section A.III.5.e, the uncontrolled mass of VOC (Mo + Md), calculated in A.III.5.a, and the collection efficiency (F), from section A.III.5.d, calculate the controlled, mass of VOC by the following equation:

VOCc = (Mo + Md) x [1- F x E]

where:

VOCc = controlled, VOC emissions (lbs/month)
F = fraction of total VOC which is emitted by the emissions unit that enters the control device, or the collection efficiency
E = VOC destruction efficiency of the control device

6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

8. The permittee shall calculate and maintain each month the following information for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined):

a. The total controlled, VOC emissions, in kgs, calculated by summing the controlled VOC emissions for emissions units K005, K006, K007, K008, K009* and K012.

b. The total solids deposited, in liters, calculated by summing the amounts of solids deposited for emissions units K005, K006, K007, K008, K009* and K012.

c. The monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids, in kilograms per liter (a/b).

* only the application of the topcoat (blackout) associated with this emissions unit

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

1.c Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.d Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.e Emission Limitations:
0.32 lb PM10/hr
0.025 lb SO2/hr
4.08 lbs NOx/hr
3.43 lb CO/hr
0.25 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.f Emission limitation:
89.3 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.h Emission Limitation:
5.19 pounds PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 89.3 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Secondary Topcoat On-Line Repair (K008)

Activity Description: Topcoat on-line repair coating booth, air supply hoses and thermal oxidizer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Secondary topcoat on-line repair (K008), equipped with a thermal incinerator (REP)** **[The VOC emissions from emissions units K007 and K008 are controlled by the same incinerator (REP).]	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	8.7 lbs volatile organic compounds (VOC) per hour 0.42 pounds of particulate emissions (PE) per hour, from overspray See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator shall not exceed the following: 0.32 lb PM10/hr 0.025 lb SO2/hr 4.08 lbs NOx/hr 3.43 lb CO/hr 0.25 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 8.7 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2. Additional Terms and Conditions (continued)

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

5. The permittee shall determine the monthly, controlled VOC emissions and the total coating solids deposited for emissions units K007 and K008, combined, as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

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

d. Determine the fraction of total VOC which enters the control device by using the following equation where "n" is the total number of stacks entering the control device and "p" is the total number of stacks not connected to the control device:

F*= [the summation of (Qbi x Cbi) for all stacks "n"] divided by [the summation of (Qbi x Cbi) for all stacks "n" + the summation of (Qfk x Cfk) for all stacks "p"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qfk= volumetric flow rate of the effluent gas flowing through exhaust stack (k) not entering the control device (dry standard cubic meters per hour)
Cfk= concentration of VOC (as carbon) in the effleuent gas flowing through exhaust stack (k) not entering the control device (ppm)

* Once available, the permittee shall use the capture efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

e. Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation, where "n" is the total number of stacks entering the control device and "m" is the toal number of stacks leaving the control device:

E* = [the summation of (Qbi x Cbi) for all stacks "n" - the summation of (Qaj x Caj) for all stacks "m"] divided by [the summation of (Qbi x Cbi) for all stacks "n"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qaj= volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
Caj= concentration of VOC (as carbon) in the effleuent gas flowing through stack (j) leaving the control devcice (ppm)

* Once available, the permittee shall use the destruction efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

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

f. Using the destruction efficiencies (E), from section A.III.5.e, the uncontrolled mass of VOC (Mo + Md), calculated in A.III.5.a, and the collection efficiency (F), from section A.III.5.d, calculate the controlled, mass of VOC by the following equation:

VOCc = (Mo + Md) x [1- F x E]

where:

VOCc = controlled, VOC emissions (lbs/month)
F = fraction of total VOC which is emitted by the emissions unit that enters the control device, or the collection efficiency
E = VOC destruction efficiency of the control device

6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

8. The permittee shall calculate and maintain each month the following information for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined):

a. The total controlled, VOC emissions, in kgs, calculated by summing the controlled VOC emissions for emissions units K005, K006, K007, K008, K009* and K012.

b. The total solids deposited, in liters, calculated by summing the amounts of solids deposited for emissions units K005, K006, K007, K008, K009* and K012.

c. The monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids, in kilograms per liter (a/b).

* only the application of the topcoat (blackout) associated with this emissions unit

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

1.c Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.d Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.e Emission Limitations:
0.32 lb PM10/hr
0.025 lb SO2/hr
4.08 lbs NOx/hr
3.43 lb CO/hr
0.25 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

V. Testing Requirements (continued)

1.f Emission limitation:
8.7 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.h Emission Limitation:
0.42 pound PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 8.7 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Wax/Polish Coating Line (K009)

Activity Description: Coating booths with manual wax application equipment and natural gas-fired air supply houses

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Wax/Polish coating line (K009)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	5.32 lbs volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average [this limitation excludes topcoat (blackout)] [This limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(d).] 87.2 lbs VOC per hour 0.29 lb particulate emissions (PE) per hour, for for over spray See A.I.2.a and b. emissions from natural gas combustion in the air supply houses: 0.12 lb PM10/hr 0.009 lb SO2/hr 1.49 lbs NOx/hr 1.3 lb CO/hr 0.08 lb VOC/hr See A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(U)(1)(d) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) (for overspray).
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.e.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the air supply houses associated with this emissions unit).
	OAC rule 3745-21-09(U)(1)(d)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted basis (for all coatings employed, except the topcoat (blackout))
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2. Additional Terms and Conditions (continued)

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The 87.2 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.d The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the air supply houses were established for PTI purposes to reflect potentials 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.e The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

2. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

3. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

4. The permittee shall determine the monthly VOC emissions and the total coating solids deposited for the blackout topcoat operation associated with this emissions unit as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

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

7. The permittee shall collect and record the following information for each day for this emissions unit:

a. The name and identification number of each coating, excluding topcoat (blackout), employed.

b. The VOC content, in pounds VOC per gallon, excluding water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each coating, excluding topcoat (blackout), employed.

c. The total VOC emissions, in pounds, for all the coatings (except topcoats) employed [summation of (# of gallons for each coating (excluding water and exempt solvents) x VOC content for each coating (excluding water and exempt solvents)) for all coatings (except topcoats)].

c. The daily, volume-weighted average VOC content of all the coatings employed, excluding topcoat (blackout), in pounds VOC per gallon, excluding water and exempt solvents, calculated in accordance with the appropriate equation in OAC rule 3745-21-10(B).

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

a. the total VOC emissions, in pounds, for all the topcoat (blackout) coatings employed, from section A.III.4 above;

b. the total VOC emissions, in pounds, for all the coatings employed (except topcoat (blackout) coatings), calculated by summing the daily VOC emission rates, from section A.III.7, for the calendar month; and

c. the total VOC emissions, in pounds, for all the coatings employed (a + b).

9. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 8. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation of 3.5 lbs/gallon of coating, excluding water and exempt solvents, for all coatings, except topcoat. The notification shall include a copy of such record and shall be sent within 45 days after the exceedance occurs.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 4. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III. of this permit.

1.b Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.d Emission Limitation:
0.12 lb PM10/hr
0.009 lb SO2/hr
1.49 lbs NOx/hr
1.3 lb CO/hr
0.08 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

1.e Emission limitation:
87.2 lbs VOC per hour

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon

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

1.f Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.g Emission Limitation:
0.29 pounds PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.h Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

1.i Emission Limitation:
3.5 lbs VOC per gallon, excluding water and exempt solvents, as a daily, volume-weighted average for all coatings, except topcoat (blackout)

Applicable Compliance Method:
Compliance with the mass VOC emissions per gallon of coating limitation shall be determined through the record keeping requirements established in Section A.III of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Final Repair (K011)

Activity Description: Coating booths and area including manual coating applicators for final off-line repair and infrared bake ovens/lamps

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Final repair (K011)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	Volatile organic compound (VOC) emissions shall not exceed 15.8 lbs per hour. 1.26 lbs of particulate emissions (PE) per hour See A.I.2.a and b. emissions from natural gas combustion: 0.07 lb PM10/hr 0.005 lb SO2/hr 0.85 lbs NOx/hr 0.72 lbs CO/hr 0.05 lb VOC/hr See A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c).
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.e.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The 97.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.d The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.e The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

2. The permittee shall burn only natural gas in this emissions unit.

3. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content (in lbs/gallon, excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

c. the total VOC emissions, in pounds, for all the coatings employed [summation of (# of gallons for each coating (excluding water and exempt solvents) x VOC content for each coating (excluding water and exempt solvents)) for all coatings]; and

d. the daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9).

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.

5. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

6. The permittee shall calculate and record each month the total VOC emissions, in pounds, for all the coatings employed for this emissions unit (the monthly VOC emissions shall be calculated by summing the daily VOC emission rates, from section A.III.1 above, for the calendar month).

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 6. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons; and

d. the daily, volume-weighted average VOC content of 4.8 lbs/gallon, excluding water and exempt solvents.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 4. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emissions Limitation:
4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements established in section A.III.1 of this permit.

1.b Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

V. Testing Requirements (continued)

1.c Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.d Emission Limitation:
0.07 lb PM10/hr
0.005 lb SO2/hr
0.85 lbs NOx/hr
0.72 lbs CO/hr
0.05 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (8,525 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

1.e Emission limitation:
15.8 lbs VOC/hr

Applicable Compliance Method:
The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon

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

1.f Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.g Emission Limitation:
1.26 pounds PE/hr, from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

2. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Specialty Topcoat Coating and On-Line Repair (K012)

Activity Description: Topcoat coating and on-line repair booths, natural gas-fired air supply house, bake oven, and thermal oxidizer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Specialty topcoat coating and on-line repair (K012), equipped with a thermal incinerator (STC)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	17.4 lbs volatile organic compounds (VOC) per hour 0.5 pound of particulate emissions (PE) per hour, from overspray See A.I.2.a, b, and c. emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.22 lb PM10/hr 0.02 lb SO2/hr 2.85 lbs NOx/hr 2.40 lb CO/hr 0.16 lb VOC/hr See A.I.2.e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average [from all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined)]
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
		* only the application of the topcoat (blackout) associated with this emissions unit

2. Additional Terms and Conditions

2.a The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.c The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

2.d The 17.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.e The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials 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.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall burn only natural gas in this emissions unit.

4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

2. The permittee shall calculate and maintain monthly records of the following information for emissions units K001 - K003 and K005 - K012, combined:

a. the total VOC emissions, in tons, for all the coatings employed (summation of the monthly VOC emission rates for emissions units K001, K002, K003, K005, K006, K007, K008, K009, K011 and K012, divided by 2000); and

b. the rolling, 12-month summation of the VOC emissions for all the coatings employed, in tons.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

4. The permittee shall maintain daily records for all the topcoat operations (emissions units K005, K006, K007, K008, K009* and K012, combined) that will enable the calculation of the VOC emission rate for the emissions units in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-028, December 1988.

The permittee shall calculate the VOC emission rate for all the coatings employed in all the topcoat operations (emissions units K005, K006, K007, K008, K009 and K012, combined), in pounds of VOC per gallon of applied solids, as a daily, volume-weighted average, using the overall capture and control efficiency of the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

* only the application of the topcoat (blackout) associated with this emissions unit

5. The permittee shall determine the monthly, controlled VOC emissions and the total coating solids deposited for this emissions unit as follows:

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

a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

c. Calculate the total volume of coatings solids deposited (Ld) in the calendar month by the following equation:

Ld = Ls x T

where:

Ld = the volume of all the coatings solids deposited (liters)

Ls = the volume of all the coatings solids consumed (liters)

T = transfer efficiency

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

d. Determine the fraction of total VOC which enters the control device by using the following equation where "n" is the total number of stacks entering the control device and "p" is the total number of stacks not connected to the control device:

F*= [the summation of (Qbi x Cbi) for all stacks "n"] divided by [the summation of (Qbi x Cbi) for all stacks "n" + the summation of (Qfk x Cfk) for all stacks "p"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qfk= volumetric flow rate of the effluent gas flowing through exhaust stack (k) not entering the control device (dry standard cubic meters per hour)
Cfk= concentration of VOC (as carbon) in the effleuent gas flowing through exhaust stack (k) not entering the control device (ppm)

* Once available, the permittee shall use the capture efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

e. Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation, where "n" is the total number of stacks entering the control device and "m" is the toal number of stacks leaving the control device:

E* = [the summation of (Qbi x Cbi) for all stacks "n" - the summation of (Qaj x Caj) for all stacks "m"] divided by [the summation of (Qbi x Cbi) for all stacks "n"]

where:

Qbi= volumetric flow rate of the effluenet gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
Cbi= concentration of VOC (as carbon) in the effleuent gas flowing through stack (i) entering the control devcice (ppm)
Qaj= volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
Caj= concentration of VOC (as carbon) in the effleuent gas flowing through stack (j) leaving the control devcice (ppm)

* Once available, the permittee shall use the destruction efficiency determined during the most recent emission testing that demonstrated the emissions unit was compliance.

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

f. Using the destruction efficiencies (E), from section A.III.5.e, the uncontrolled mass of VOC (Mo + Md), calculated in A.III.5.a, and the collection efficiency (F), from section A.III.5.d, calculate the controlled, mass of VOC by the following equation:

VOCc = (Mo + Md) x [1- F x E]

where:

VOCc = controlled, VOC emissions (lbs/month)
F = fraction of total VOC which is emitted by the emissions unit that enters the control device, or the collection efficiency
E = VOC destruction efficiency of the control device

6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

8. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 7. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge materials, of 1268.65 tons;

b. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

c. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons;

d. the calculated, controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average; and

e. the calculated, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

IV. Reporting Requirements (continued)

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 6. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average.

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.5. of this permit.

1.b Emission Limitation:
15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average

Applicable Compliance Method:
Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.

1.c Emission Limitation:
1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2. of this permit.

1.d Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

V. Testing Requirements (continued)

1.e Emission Limitations:
0.22 lb PM10/hr
0.02 lb SO2/hr
2.85 lbs NOx/hr
2.40 lb CO/hr
0.16 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is assumed to be PM10

1.f Emission limitation:
17.4 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be demonstrated shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

The hourly allowable VOC emission limitation was established as follows:

Eh = [Cu * VC * (1 - Ce * De)]

Eh = maximum VOC emissions (lbs/hr)
Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents
VC = maximum coating VOC content, in pounds per gallon
Ce = capture efficiency (assumed to 70%)
De = destruction efficiency of the thermal incinerator (assumed to be 90%)

1.g Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.h Emission Limitation:
0.5 pound PE per hour from coating overspray

Applicable Compliance Method:
To determine the actual worst-case rate for PE, the following equation may be used:

E = maximum coating solids usage rate, in pounds per hour x (1 - TE) x (1 - CE)

E = PE rate, in pounds per hour

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based on the results of the most recent transfer efficiency testing)

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 17.4 lbs VOC/hr; and the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

V. Testing Requirements (continued)

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Body Primer Application (K013)

Activity Description: Application of primer on metal sufaces for the installation of fixed quarter and windshield glass.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Window install process, various manual and automatic coating applications - Assembly Department (K013)	OAC 3745-31-05(A)(3) (PTI 05-7923)	when coating metal parts, the volatile organic compound (VOC) emissions shall not exceed 19.6 pounds hour, for the coatings used for metal parts The organic compound (OC) emissions shall not exceed 5.8 pounds per hour [for all the materials employed, except for those used pursuant to OAC rule 3745-21-09(U)(2)(f)]. when coating metal parts, 29.2 tons VOC/rolling, 12-month summation, for the coatings used for metal parts 9.98 tons OC per rolling, 12-month summation [for all the materials employed, except for those used pursuant to OAC rule 3745-21-09(U)(2)(f)]. when coating metal parts, 6.54 lbs VOC per gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average for the coatings used for metal parts (see A.I.2.b) The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-21-09(U)(2)(f).
	OAC rule 3745-21-09(U)(2)(f)	See A.I.2.b.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)	See A.II.2, for all the materials employed, except for those used pursuant to OAC rule 3745-21-09(U)(2)(f).

2. Additional Terms and Conditions

2.a The 19.6 lbs VOC per hour limitation and the 5.8 lbs OC per hour limitation were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limits.

2.b Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

2. The permittee shall not employ any liquid organic material, except any material used pursuant to OAC rule 3745-21-09(U)(2)(f), in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. When coating metal parts, the permittee shall collect and record the following information each month for this emissions unit (for the coatings used for metal parts):

a. the name and identification number of each coating, as applied;

b. the VOC content (in lbs/gallon, excluding water and exempt solvents) of each coating, as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B);

e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in gallons, of each coating employed (c), and sum the results for all the coatings employed; and

f. the rolling, 12-month VOC emissions for all the coatings employed, in tons.

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

2. The permittee shall collect and record the following information each month, except when coating metal parts, for this emissions unit:

a. the name and identification number of each liquid organic material employed;

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material;

c. the number of gallons of each liquid organic material employed;

d. the OC content of each liquid organic material employed, in pounds per gallon;

e. the total OC emissions for all the liquid organic materials employed, in pounds, i.e., multiply the amount, in gallons, of each liquid organic material employed (c) by the respective OC content (d), and sum the results for all liquid organic materials; and

f. the rolling, 12-month OC emissions for all the liquid organic materials employed, in tons.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 and 2. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation of 29.2 tons;

b, the rolling, 12-month OC emission limitation of 9.98 tons; and

c. the monthly, volume-weighted average VOC content limitation of 6.54 lbs VOC/gallon, excluding water and exempt solvents (for the coatings used for metal parts).

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive liquid organic material, except when coating metal parts, was employed in this emissions unit. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 and 2. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
when coating metal parts, the volatile organic compound (VOC) emissions shall not exceed 19.6 pounds hour, for the coatings used for metal parts

Applicable Compliance Method:
Compliance may be determined by the following equation:

Eh = [Cu * VC]

Eh = the maximum VOC emissions (lbs/hr)
Cu = the maximum potential coating usage rate, in gallons/hr
VC = the maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance wit the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation:
5.8 lbs OC per hour, for all the materials employed, except for those used pursuant to OAC rule 3745-21-09(U)(2)(f).

Applicable Compliance Method:
Compliance may be determined by the following equation:

Eh = [Cu * VC]

Eh = maximum OC emissions (lbs/hr)
Cu = maximum potential material usage rate, in gallons/hr
VC = maximum material OC content, in pounds per gallon

If required, the permittee shall demonstrate compliance wit the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.c Emission Limitation:
29.2 tons VOC per rolling, 12-month summation

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements specified in Section A.III.1 of this permit.

1.d Emission Limitation:
9.98 tons OC per rolling, 12-month summation

Applicable Compliance Method:
Compliance with the annual allowable OC emission limitation shall be determined through the record keeping requirements specified in Section A.III.2 of this permit

1.e Emission Limitation:
6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average

Applicable Compliance Method:
Compliance with the VOC content limitation shall be determined through the record keeping requirements specified in Section A.III.1 of this permit.

V. Testing Requirements (continued)

2. USEPA Method 24 shall be used to determine the VOC/OC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Plastic Coating Line (K015)

Activity Description: Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, flash-off areas, cure oven, burners associated with air supply houses and thermal incinerator

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Plastic parts coating line - includes primer booth, basecoat booth, clearcoat booth, flash-off areas, cure oven, burners associated with air supply houses, and thermal incinerator (K015)	OAC rule 3745-31-05(A)(3) (PTI 05-10278)	3,512.0 lbs volatile organic compounds (VOC) per day (see A.I.2.b) See A.I.2.a. 7.46 lbs/hr, 172.0 lbs/day and 8.64 tons/yr particulate emissions (PE), from overspray emissions from natural gas combustion in the curing oven, the air supply houses, and the incinerator: 0.47 lb/hr, 2.04 TPY PE 0.04 lb/hr, 0.16 TPY SO2 6.12 lbs/hr, 26.8 TPY NOx 5.15 lbs/hr, 22.51 TPY CO 0.67 lb/hr, 2.95 TPY total organic compounds (TOC) See A.I.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-07(G) and 3745-31-05(D).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
	OAC rule 3745-21-07(G)	See A.II.5.
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d.
	OAC rule 3745-31-05(D) (PTI 05-10278)	188.0 tons VOC per rolling, 12-month summation
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).

2. Additional Terms and Conditions

2.a The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 95%, by weight, for VOC.

2.b The 3,512.0 lbs VOC per day emission limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.c The hourly emission limitations for PE, SO2, NOx, CO and TOC (from natural gas combustion) were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limitations.

2.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-10278.

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

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

II. Operational Restrictions (continued)

2. The maximum annual production rate for this emissions unit shall not exceed 305,000 bumper sets and 305,000 instrument panels, based upon rolling, 12-month summations of the monthly production rates.

3. The permittee shall operate a downdraft/scrubber control system in each booth whenever this emissions unit is in operation.

4. The permitee shall burn only natural gas in this emissions unit.

5. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees C) below the average temeperature during the most recent emissions test that demonstrated the the emissions unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

a. the production rate for both bumper sets and instrument panels; and

b. the rolling, 12-month production rates for both bumper sets and instument panels.

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

a. the company identification for each coating and cleanup material employed;

b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and cleanup material employed;

d. the VOC content of each coating and cleanup material employed, in pounds per gallon;

e. the total VOC input for all the coatings and cleanup materials, in pounds, i.e. multiply the amount, in gallons, of each coating and cleanup material employed (c) by the respective VOC content (d), and sum the results for all the coatings and cleanup materials, in pounds;

f. the controlled, VOC emissions for all the coatings and cleanup materials employed, calculated using the overall control efficiency determined during the most recent emission testing that demonstrated the emissions unit was in compliance, i.e., [(e) x (1 - overall control efficiency)] x 1/2000, in tons; and

g. the rolling, 12-month VOC emissions for all the coatings and cleanup materials employed, in tons.

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

4. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit is not in service while this emissions unit is operating.

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following record keeping requirements are as stringent as or more stringent than the record keeping requirements contained in Permit to Install 05-10278, issued on December 22, 1999: A.IV.1 thru 6. The record keeping requirements contained in the above-references Permit to Install are subsumed into the record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying record keeping requirements in the Permit to Install.

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 incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC emission limitation of 188.0 tons; and

b. the rolling, 12-month production rate restrictions for bumper sets and instrument panels of 305,000 each.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that the downdraft/scrubber control was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

4. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

5. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-10278, issued on December 22, 1999: A.IV.1 thru 5. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
3,512.0 lbs VOC per day

Applicable Compliance Method:
Compliance with the daily allowable VOC emission limitation above shall be based on the results of emission testing conducted in accordance with Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (lbs/hr) mutliplied by 24.

Compliance may also be determined by the following equation:

Ed = [Up x VC x (1 - Cp x De)] + [Ut x VC x (1 - Ct x De)] + [Uc x VC x (1 - Cc x De)]

Ed = maximum VOC emissions (lbs/day)
Up = maximum potential primer usage per day, in gallons
Ut = maximum potential topcoat usage per day, in gallons
Uc = maximum potential clearcoat usage per day, in gallons
VC = maximum coating VOC content, in pounds per gallon
Cp = capture efficiency of primer booth
Ct = capture efficiency of topcoat booth
Cc = capture efficiency of clearcoat booth
De = destruction efficiency of the thermal incinerator

1.b Emission Limitations:
7.46 lbs/hr, 172.0 lbs/day and 8.64 tons/yr PE, from coating over spray

Applicable Compliance Method:
To determine the actual worst-case hourly, daily, or annual emission rate for PE, the following equation may be used:

E = U x (1 - TE) x (1 - CE)

where,

E = PE rate, in lbs/hr, lbs/day, or ton/yr

U = maximum coating solids usage rate, in lbs/hr, lbs/day, or tons/yr

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (based upon the results of the most recent transfer efficiency test)

CE = control efficiency of the downdraft/scrubber control system

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 thru 5.

V. Testing Requirements (continued)

1.c Emission Limitations:
0.47 lb/hr, 2.04 TPY PE
0.04 lb/hr, 0.16 TPY SO2
6.12 lbs/hr, 26.8 TPY NOx
5.15 lbs/hr, 22.51 TPY CO
0.67 lb/hr, 2.95 TPY TOC

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (61,200 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

Compliance with the annual allowable emission limitation for each pollutant shall be assumed as long as compliance with the hourly allowable emission limitation for each pollutant is maintained (the annual limitation for each pollutant was determined by multiplying the hourly allowable for each pollutant by 8760, and then dividing by 2000).

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PE, 1.9 lbs PE/mm cu. ft.; for OC, 5.5 lbs OC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

1.d Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

1.e Emissions Limitation:
188.0 tons VOC per rolling, 12-month summation

Applicable Compliane Method:
Compliance with the rolling, 12-month VOC emission limitation shall be determined through the record keeping requirements specified in Section A.III.3. of this permit.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 1 year after permit issuance and within 1year prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the following: 3,512 lbs VOC/day; and the 95% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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 contend of gas stream); and

v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

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

d. 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)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office 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.

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.

3. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Plastic parts coating line - includes primer booth, basecoat booth, clearcoat booth, flash-off areas, cure oven, burners associated with air supply houses, and thermal incinerator (K015)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K015 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexane

TLV (ug/m3): 96,000.0

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,113.1

MAGLC (ug/m3): 2,286.0

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

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EDP Sanding (P003)

Activity Description: EDP sanding booth(s)

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
EDP sanding (P003), with fabric filter	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	2.1 lbs particulate emissions (PE) per hour See A.1.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	None, see A.II.3.

2. Additional Terms and Conditions

2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.b All the PE from this emissions unit shall be vented to a fabric filter.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be a minimum of 0.75 inch of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 pressure drop across the fabric filter on a weekly basis.

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

a. the surface area sanded, in square feet;

b. the maximum depth sanded, in feet;

c. the maximum density of the material sanded, in pounds per cubic feet;

c. the number of hours the emissions unit was in operation; and

d. the average hourly PE rate, in pounds per hour, determined by multiplying the surface area sanded, from section A.III.2.a above, by the maximum depth sanded, from section A.III.2.b above, and by the maximum density of the sanded material, from section A.III.2.c above, and by (1 - the overall control efficiency for PE), and then dividing by the number of hours the emissions unit was in operation, from section A.III.2.c above.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

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

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

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 4. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify any periods of time during which the pressure drop across the fabric filter did not comply with the minimum pressure drop restriction. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

b. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons; and

c. the average hourly PE limitation of 2.1 lbs.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 3. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
2.1 pounds PE/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the record keeping requirements established in section A.III.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Surfacer Sanding (P004)

Activity Description: Surfacer sanding booths

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Surfacer sanding booths (P004)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	1.75 lbs particulate emissions (PE) per hour See A.1.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	None, see A.II.3.

2. Additional Terms and Conditions

2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.b All the PE from this emissions unit shall be vented to a fabric filter.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be a minimum of 0.75 inch of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 pressure drop across the fabric filter on a weekly basis.

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

a. the surface area sanded, in square feet;

b. the maximum depth sanded, in feet;

c. the maximum density of the material sanded, in pounds per cubic feet;

c. the number of hours the emissions unit was in operation; and

d. the average hourly PE rate, in pounds per hour, determined by multiplying the surface area sanded, from section A.III.2.a above, by the maximum depth sanded, from section A.III.2.b above, and by the maximum density of the sanded material, from section A.III.2.c above, and by (1 - the overall control efficiency for PE), and then dividing by the number of hours the emissions unit was in operation, from section A.III.2.c above.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

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

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

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 4. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify any periods of time during which the pressure drop across the fabric filter did not comply with the minimum pressure drop restriction. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

b. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons; and

c. the average hourly PE limitation of 1.75 lbs.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 3. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
1.75 pounds PE/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the record keeping requirements established in section A.III.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: On-Line Repair Sanding (P014)

Activity Description: Repair sanding booth

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
On-Line repair sanding (P014)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	10.5 lbs particulate emissions (PE) per hour See A.1.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	None, see A.II.3.

2. Additional Terms and Conditions

2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.b All the PE from this emissions unit shall be vented to a fabric filter.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be a minimum of 0.75 inch of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 pressure drop across the fabric filter on a weekly basis.

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

a. the surface area sanded, in square feet;

b. the maximum depth sanded, in feet;

c. the maximum density of the material sanded, in pounds per cubic feet;

c. the number of hours the emissions unit was in operation; and

d. the average hourly PE rate, in pounds per hour, determined by multiplying the surface area sanded, from section A.III.2.a above, by the maximum depth sanded, from section A.III.2.b above, and by the maximum density of the sanded material, from section A.III.2.c above, and by (1 - the overall control efficiency for PE), and then dividing by the number of hours the emissions unit was in operation, from section A.III.2.c above.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

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

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

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 4. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify any periods of time during which the pressure drop across the fabric filter did not comply with the minimum pressure drop restriction. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

b. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons; and

c. the average hourly PE limitation of 10.5 lbs.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 3. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
10.5 pounds PE/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the record keeping requirements established in section A.III.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: VQD Final Inspection Dynamometer (P015)

Activity Description: Dynamometer used to conduct engine and electrical quality checks after final assembly.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
VQD Final Inspection Dynamometer (P015)	OAC 3745-31-05(A)(3) (PTI 05-10359)	emissions from the combustion of gasoline: 0.0647 lb of particulate emissions (PE)/hr, 0.283 ton PE/yr 0.0531 lb of sulfur dioxide (SO2)/hr, 0.232 ton of SO2/yr 1.02 lb of nitrogen oxides (NOx)/hr, 4.46 tons of NOx/yr 1.48 lbs of organic compounds (OC)/hr, 6.48 tons of OC/yr 2.0 lbs of carbon monoxide (CO)/hr, 8.76 tons of CO/yr Visible PE shall not exceed 20% opacity, as a 6-minute average.
	OAC rule 3745-17-07(A)	None, see A.I.2.b.
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.c.
	OAC rule 3745-21-08(B) and3745-23-06(B)	See A.I.2.d.
	OAC rule 3745-18-06(G)	Exempt, see A.I.2.e.

2. Additional Terms and Conditions

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

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)(ii), 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.

2.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in Permit to Install 01-6489.

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

2.e This emissions unit is exempt from the emission limitation specified in OAC rule 3745-18-06(G), pursuant to OAC rule 3745-18-06(B), because the internal combustion engines tested within this emissions unit have rated heat input capacities less than ten million Btu per hour.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:
CO emissions shall not exceed 2.0 lbs/hr and 8.76 tons/yr.

Applicable Compliance Method:
The hourly CO emission limitation was established by multiplying the maximum hourly gallon usage rate (10 gallons/hr) by the emission factor of 0.2 lb CO/gallon of gasoline (this emission factor was derived based on the results of emission testing conducted on 8/20/97 on an uncontrolled V6 engine at maximum operating conditions on dynamometer B018 at the Honda R&D North America, Inc.).

As long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation shall be assumed (the annual emission limitation was determined by multiplying the hourly emission limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

1.b Emission Limitation:
PE shall not exceed 0.0647 lb/hr and 0.283 ton/yr
SO2 emissions shall not exceed 0.0531 lb/hr and 0.232 ton/yr
NOx emissions shall not exceed 1.02 lbs/hr and 4.46 tons/yr
OC emissions shall not exceed 1.48 lbs/hr and 6.48 tons/yr

Applicable Compliance Method:
The hourly PE, SO2, NOx, and OC emission limitations were established by multiplying the maximum hourly gallon usage rate (10 gallons/hr) by the corresponding emission factors for each pollutant.*

As long as compliance with the hourly emission limitation for each pollutant is maintained, compliance with the annual emission limitation for each pollutant shall be assumed (the annual emission limitation for each pollutant was determined by multiplying the hourly emission limitation for each pollutant by 8760, and then dividing by 2000).

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

*for PE, 6.47 lbs PE/1000 gallons; for SO2, 5.31 lbs SO2/1000 gallons; for NOx, 102 lbs NOx/1000 gallons; and for OC, 148 lbs OC/1000 gallons [these emission factors are from U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines]

** For NOx, Methods 1 - 4 and 7; for OC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5 ; and for SO2, Methods 1 - 4 and 6.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Topcoat Inspection Sanding (P016)

Activity Description: All body sanding

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Topcoat inspection sanding, all-body repair sanding (P016)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	5.29 lbs particulate emissions (PE) per hour See A.1.2.a and b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07(G).
	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	None, see A.II.3.

2. Additional Terms and Conditions

2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.b All the PE from this emissions unit shall be vented to a fabric filter.

II. Operational Restrictions

1. The pressure drop across the fabric filter shall be a minimum of 0.75 inch of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

3. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation. 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 pressure drop across the fabric filter on a weekly basis.

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

a. the surface area sanded, in square feet;

b. the maximum depth sanded, in feet;

c. the maximum density of the material sanded, in pounds per cubic feet;

c. the number of hours the emissions unit was in operation; and

d. the average hourly PE rate, in pounds per hour, determined by multiplying the surface area sanded, from section A.III.2.a above, by the maximum depth sanded, from section A.III.2.b above, and by the maximum density of the sanded material, from section A.III.2.c above, and by (1 - the overall control efficiency for PE), and then dividing by the number of hours the emissions unit was in operation, from section A.III.2.c above.

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

3. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

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

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

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 4. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify any periods of time during which the pressure drop across the fabric filter did not comply with the minimum pressure drop restriction. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons;

b. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons; and

c. the average hourly PE limitation of 5.29 lbs.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1 thru 3. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:
5.29 pounds PE/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the record keeping requirements established in section A.III.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3. of this permit.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Final Repair Sanding (P017)

Activity Description: Inspection sanding

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Final repair inspection sanding (P017)	OAC rule 3745-31-05(A)(3) (PTI 05-7923)	1.13 lbs particulate emissions (PE) per hour See A.1.2.a. emissions from natural gas combustion in the air make-up system: 0.86 lb PE/hr 0.07 lb SO2/hr 15.0 lbs NOx/hr 9.5 lbs CO/hr 0.63 lb VOC/hr See A.I.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-07(G), 3745-23-06(B), 3745-21-08(B) and 3745-17-10(B).
	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(2)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the air make-up units associated with this emissions unit).
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the air-makeup units associated with this emissions unit).
	OAC rule 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d.
	OAC rule 3745-21-07(G)	None, see A.II.3.

2. Additional Terms and Conditions

2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

2.b The 1.13 lbs PE per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit.Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

2.c The emission limitations for PE, SO2, NOx, CO and OC, from natural gas combustion in the air make-up system, were established for PTI purposes to reflect potentials 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.d The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install No. 05-7923.

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

II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K003. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

2. The permittee shall burn only natural gas in the air make-up system serving this emissions unit.

II. Operational Restrictions (continued)

3. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain monthly records of the following information for emissions unit K001 - K003, K005 - K012, P001, P003, P005, P014, P016 and P017, combined:

a. the name and identification of each liquid organic cleanup/purge material employed;

b. the number of gallons of each liquid organic cleanup/purge material employed;

c. the VOC content, in pounds per gallon, of each liquid organic cleanup/purge material employed;

d. the total VOC emissions for all the liquid organic cleanup/purge materials employed, prior to any credit for recovered materials, in pounds, i.e., multiply the amount, in gallons, of each cleanup/purge material employed (b) by the respective VOC content (c), and sum the results for all cleanup/purge materials;

e. the date the recovery tank was emptied;

f. the date the materials from the recovery tank were shipped off site;

g. the number of gallons of materials from the recovery tank shipped off site;

h. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

i. the total VOC from the recovered materials, to be credited against the total VOC emissions from the liquid organic cleanup/purge materials employed, in pounds (g x h).

j. the net total VOC emissions for all the liquid organic cleanup/purge material employed, in tons [(d - i)/2000]; an

k. the rolling, 12-month summation of the monthly VOC emission rates for all the liquid organic cleanup/purge materials employed, in tons.

2. For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

3. The permittee shall perform daily checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. the cause of the visible emissions;
c. the total duration of any visible emission incident; and
d. any corrective actions taken to eliminate the visible emissions.

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

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

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

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

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.III.1 thru 4. The monitoring and record keeping requirements contained in the above-references Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly VOC emission limitation from the liquid organic cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 38.4 tons; and

b. the rolling, 12-month VOC emission limitation from liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, of 103.3 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. 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 natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to Ohio EPA, Southwest District Office, by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any monthly record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-7923, issued on April 17, 1996: A.IV.1. and 4. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
1.13 pounds PE/hr

Applicable Compliance Method:
The hourly allowable PE limitation was established as follows:

Eh = [As * Ds* Dw]

where,

Eh = pounds PE per hour
As = the maximum area sanded, in square feet/hr
Ds = the maximum depth, in feet
Dw = density, pounds per cubic feet

If required, the permittee shall demonstrate compliance with hourly PE limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitations:
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:
Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1. of this permit.

1.c Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.d Emission Limitations:
0.86 lb PE/hr
0.07 lb SO2/hr
15.0 lbs NOx/hr
9.5 lbs CO/hr
0.63 lb VOC/hr

Applicable Compliance Method:
The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (112,850 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PE, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs OC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: WE Sealer Wipe (P018)

Activity Description: Solvent-moistened rags used to wipe metal car bodies to remove weld sealer and other contaminants

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
White body cleaning station - Weld Department (P018)	OAC rule 3745-31-05(A)(3) (PTI 05-06431)	1.11 lbs organic compounds (OC) per hour (as a monthly average) 4.86 tons OC per rolling, 12-month summation See A.II.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	See A.II.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The maximum annual automobile production rate for this emissions unit shall not exceed 267,000 automobiles, measured at Assembly Off, based upon a rolling, 12-month summation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification for each liquid organic material employed;

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material;

c. the number of gallons of each liquid organic material employed;

d. the organic compound content of each liquid organic material employed, in pounds per gallon;

e. the total organic compound emission rate for all the liquid organic materials employed, in pounds [summation of (c x d) for all liquid organic materials];

f. the total number of hours the emissions unit was in operation;

g. the average hourly organic compound emission rate for all the liquid organic materials employed, i.e., (e)/(f), in pounds per hour (average);

h. the rolling, 12-month summation of the monthly OC emission rates, in tons;

i. the number of automobiles produced, measured at Assembly Off; and

j. the rolling, 12-month summation of the monthly number of automobiles produced.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify each month when any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of OC emitted during each such month, in pounds. These reports shall be submitted to the Director (Ohio EPA, Southwest District Office) within 30 days of the deviation.

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

a. an identification of each month during which the average hourly total organic compound emissions exceeded 1.11 pounds per hour, and the actual average hourly organic compound emissions for each such month;

b. an identification of each month during which the rolling, 12-month OC emission limitation exceeded 4.86 tons, and the actual rolling, 12-month summation of OC emissions for each such month; and

c. an identification of each month during which the rolling, 12-month number of automobiles produced exceeded 267,000, and the actual rolling, 12-month number of automobiles produced for each such month.

These reports shall be due by the dates described in Part 1 - General Terms and Conditions section A.2.c.ii. of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emissions Limitation:
1.11 lbs/hr OC (as a monthly average)

Applicable Compliance Determination -
Compliance shall be determined through the record keeping requirement established in Section A.III.1. of this permit.

If required compliance shall be determined in accordance with 40 CFR, Part 60, Appendix A, Mehtod 18, 25, or 25A, as appropriate

1.b Emissions Limitation:
4.86 tons OC/rolling, 12-month summation

Applicable Compliance Demonstration -
Compliance shall be determined through the record keeping requirement established in section A.III.1. of this permit.

1.c Emissions Limitation:
The maximum annual automobile production rate for this emissions unit shall not exceed 267,000 automobiles, measured at Assembly Off, based upon a rolling, 12-month summation.

Applicable Compliance Demonstration -
Compliance shall be determined through the record keeping requirement established in section A.III of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the cleanup/solvent materials.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
White body cleaning station - Weld Department (P018)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P018 was evaluated based on the actual material and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate (Stoddard Solvent)

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 1.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 47.2

MAGLC (ug/m3): 13,633.0

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

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Plastic Pretreatment System (P019)

Activity Description: Plastic pretreatment process including spray and rinse tanks and steam heated dry-off oven

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Plastic pretreatment process including spray and rinse tanks and steam heated dry-off oven (P019)	OAC rule 3745-31-05(A)(3) (PTI 05-6665)	3.198 lbs volatile organic compounds (VOC) per hour, as a monthly average 1,599.013 lbs VOC per month 9.594 tons VOC per year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	See A.II.5.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The total surface pretreatment material usage in the plastic pretreatment system shall not exceed 67,762.5 pounds per month, as applied.

2. The VOC content of the surface pretreatment material employed in this emissions unit shall not exceed 0.1 percent by weight, as applied.

3. The total detergent usage in this emissions unit shall not exceed 156,250 pounds per month, as applied.

4. The VOC content of the detergent shall not exceed 0.98 percent by weight, as applied.

5. The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

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

a. the amount, in pounds, of each surface pretreatment material employed;

b. the VOC content of each surface pretreatment material employed, in %, by weight;

c. the amount, in pounds, of each detergent employed;

d. the VOC content of each detergent employed, in %, by weight;

e. documentation on whether or not each material employed is a photochemically reactive material;

f. the total VOC emissions for the surface pretreatment materials and detergents employed, in pounds [summation of (a x b) for all surface pretreatment materials + summation of (c x d) for all detergents];

g. the number of hours the emissions unit was in operation;

h. the average hourly VOC emission rate (f/g), in pounds (average);

i. the total amount of surface pretreatment materials usage (summation of a for all surface pretreatment materials), in pounds; and

j. the total amount of detergent materials (summation of c for all detergents), in pounds.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following record keeping requirements are as stringent as or more stringent than the record keeping requirements contained in Permit to Install 05-6665, issued on June 24, 1994: A.IV.1. The record keeping requirements contained in the above-references Permit to Install are subsumed into the record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the monthly surface pretreatment material usage limitation of 67,762.5 lbs;

b. the VOC content limitation for the surface pretreatment material of 0.1%, by weight;

c. the monthly detergent usage limitation of 156,250 lbs;

d. the VOC content limitation for the detergent of 0.98%, by weight;

f. the average hourly VOC emission limitation of 3.198 lbs; and

g. the monthly VOC emission limitation of 1,599.013 lbs.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

IV. Reporting Requirements (continued)

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-6665, issued on June 24, 1994: A.IV.1 and 2. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:
3.198 lbs VOC per hour

Applicable Compliance Method:
Compliance with the hourly allowable VOC emissions limitation shall be detemined through the record keeping requirements specified in Section A.III.1. of this permit.

If required, compliance shall be determined in accordance with Method 25 or 25A of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation:
1,599.013 lbs VOC per month

Appicable Compliance Method:
Compliance with the monthly allowable VOC emission limitation shall be detemined through the record keeping requirement as specified in Section A.III.1. of this permit.

1.c Emission Limitation:
9.594 tons VOC per year

Applicable Compliance Method:
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in Section A.III.1. of this permit, and shall be the summation of the 12 monthly VOC emission rates for the calendar year.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the materials employed in 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Plastic Parts Painting Miscellaneous Solvent Usage (P021)

Activity Description: Miscellaneous solvent cleaning and solvent wiping of plastic parts. Solvent-moistened Rags; Used Rag Containers.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous solvents for cleaning of plastic parts (P021)	OAC rule 3745-31-05(A)(3) (PTI 05-10278)	970.8 lbs volatile organic compounds (VOC) per day, as a monthly average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).
	OAC rule 3745-21-07(G)	See A.II.2.
	OAC rule 3745-31-05(D) PTI 05-10278	12.85 tons VOC per rolling, 12-month summation

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual production rate for this emissions unit shall not exceed 305,000 bumper sets and 305,000 instrument panels, based upon rolling, 12-month summations of the monthly production rates.

The monitoring, record keeping and reporting requirements to ensure compliance with this production limitation are contained in Part III - Terms and Conditions for emissions unit K015. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

2. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

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

a. the name and identification of each material employed;

b. documentation on whether of not the material employed is a photochemically reactive material;

c. the amount, in gallons, of each material employed;

d. the VOC content of each material employed, in pounds per gallon;

e. the VOC emissions from all the materials employed [summation of (c x d) for all materials employed];

f. the number of days the emissions unit was in operation;

g. the average VOC emissions per day (e/f), in pounds (average); and

h. the rolling, 12-month VOC emissions rate, in tons.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following record keeping requirements are as stringent as or more stringent than the record keeping requirements contained in Permit to Install 05-10278, issued on December 22, 1999: A.IV.1. The record keeping requirements contained in the above-references Permit to Install are subsumed into the record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA, Southwest District Office, in writing of any record showing that any photochemically reactive material was employed in this emissions unit. The notification shall include a copy of each record and shall be submitted within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the average daily VOC emission limitation of 970.8 lbs; and

b. the rolling, 12-month VOC emission limitation of 12.85 tons.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 05-10278, issued on December 22, 1999: A.IV.1 and 2. The reporting requirements contained in the above-references Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
970.8 lbs VOC per day (as a monthly average)

Applicable Compliance Method:
Compliance with the daily allowable VOC emission limitation shall be determined through the record keeping requirement as specified in Section A.III.1. of this permit.

If required, compliance shall be determined in accordance with Method 18, 25 or 25A, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation:
12.85 tons VOC per rolling, 12-month summation

Applicable Compliance Method:
Compliance with the rolling, 12-month VOC emission limitation shall be based on the record keeping requirements as specified in Section A.III.1. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the materials employed in 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Miscellaneous solvents for cleaning of plastic parts (P021)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (ug/m3): 233,000.0

Maximum Hourly Emission Rate (lbs/hr): 40.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.133

MAGLC (ug/m3): 5,547.62

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

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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