State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

2/17/2009

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Stephen Fogle
Honda of America Mfg., Inc., Marysville Auto Plant
Marysville Automobile Plant
24000 Honda Parkway
Marysville, OH 43040-9251

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0104402
Permit Type: Initial Installation
County: Union

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Journal Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

   ___ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:
   Honda Manufacturing in Marysville manufactures vehicles on two assembly lines and has numerous other various assemblies. The facility has several injection molding sources soon to include the CM-1 plastic injection molding machine that is included in this permit, P0104402. This unit, P348, will replace two existing units, P003 and P312, which will be shutdown once the new unit is installed and operational. P003 and P312 were previously permitted in PTI 01-05659 along with emission unit P313 with combined limits. In this permit, P0104402, P313 and P348 will have combined limits. The permit 01-05659 will get an Admin Mod. to include the new limits associate with P313.

3. Facility Emissions and Attainment Status:
   Honda is a TV facility for VOCs.

4. Source Emissions:
   The aforementioned emission units have a total limit of 7.73 tons per year of VOCs. BAT does not apply because the emissions are less than 10tpy combined; based on the federally enforceable restriction of the 12-month rolling average of OC, OAC rule 3745-31-05(D).

5. Conclusion:
   This permit is considered a rush by Honda because they will need adequate time for the permit to go draft, receive comments, and get issued before their internal deadline of May 22. The shutdown of the two existing units and the installation of the new unit, P348, will decrease the total emissions as previously permitted for these sources.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	7.73

Union County

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Honda of America Mfg., Inc., Marysville Auto Plant

Issue Date: 2/17/2009
Permit Number: P0104402
Permit Type: Initial Installation
Permit Description: Initial Installation of a molding injection machine.
Facility ID: 0180010193
Facility Location: Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway,
Marysville, OH 43040-9251
Facility Description: Automobile Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Natalie Parsons at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID: 0180010193
Permit Number: P0104402
Permit Type: Initial Installation
Issued: 2/17/2009
Effective: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

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Authorization

Facility ID: 0180010193
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): A0036723
Permit Number: P0104402
Permit Description: Initial Installation of a molding injection machine.
Permit Type: Initial Installation
Permit Fee: $500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/17/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway
Marysville, OH 43040-9251

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104402
Permit Description: Initial Installation of a molding injection machine.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P348**
Company Equipment ID:	Injection Mold CM 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, revoked, or revoked and reissued, for cause. 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 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.

4. 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:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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:

(1) 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.

(2) 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 ORC section 3704.08.

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

(4) 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.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e.,

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. **P348, Injection Mold CM 1**

Operations, Property and/or Equipment Description:

Injection Molding Machine CM 1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	3.06 tons of total organic compound (OC) emissions per rolling, 12-month period from molding plastics on P348 and P313 combined. 4.67 tons of total OC per rolling, 12-month period from mold release, mold cleaner, mold protectant, and cleaning solvents used on P348 and P313 combined. See Section c)(1) and c)(2) below.
b.	OAC rule 3745-21-07(G)	OC emissions shall not exceed 8 pounds/hr and 40 pounds/day when using photochemically reactive materials This emission unit is exempt from the emission limitation of OAC rule 3745-21-07(G)(2) when employing only non-photochemical reactive materials or material exempt under 3745-21-07(G)(9). See Section b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	See Section b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee shall maintain a label on this emissions unit which shall identify the machine. This identifying label shall be either the emission unit number assigned

in this permit or the permittee's identification number, as described in the summary, found in Section 1.

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b, d)(2), e)(1)a. and e(1)b.

c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than 10 tons/yr taking into account the federally enforceable limit under OAC rule 3745-31-05(D) based on the rolling 12-month average for OC.

c) Operational Restrictions

(1) The maximum molding plastic pellet usage on molding machines P348 and P313 shall,be limited by the following formula, calculated as a rolling, 12-month period:

$$3.06 \text{ tons OC} \exists 3 \sum_{n=1}^{i} \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P*i* = usage of molding plastic pellet usage, in tons

OC*i* = organic compound content of material *i*, in pounds of OC/ton of material

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

(2) The maximum mold release, mold cleaner, mold protectant, and cleaning solvent usage on molding machines P348 and P313 shall be limited by the following formula, calculated as a rolling, 12-month period:

$$4.67 \text{ tons OC} \exists 3 \sum_{n=1}^{i} \frac{(M_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

M*i* = usage of mold release, mold cleaner, mold protectant and/or cleaning solvent *i*, in gallons
OC*i* = organic compound content of material *i*, in pounds of OC/gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for P348 and P313 combined:

a. the company identification for each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed;

b. documentation on whether or not each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed is photochemically reactive;

c. the total number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed, in gallons/month;

d. the OC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets, in pounds/gallon or pounds/pound;

e. the calculated OC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent;

f. the total amount of each polymer type of plastic pellets molded, in pounds or tons; and

g. the calculated OC emissions from each polymer type of plastics molded;

h. the calculated rolling, 12-month summation of total OC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent employed, in tons, as calculated by the formula in c)(1) above; and

i. the calculated rolling, 12-month summation of total OC emissions from the molded plastic pellets, as calculated by the formula in c)(2) above, in tons.

(2) The permittee shall collect and record the following information on a daily basis when employing photochemically reactive materials:

a. the number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed in this emissions unit;

b. the OC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed in this emissions unit, in pounds/gallon or pounds/pound;

c. the calculated total OC emission rate for all mold release, mold cleaner, mold protectant, cleaning solvent, and molded plastic employed in this emissions unit, in pounds per day;

d. the total number of hours this emissions unit was in operation; and

e. the average hourly OC emission rate from all mold release, mold cleaner, mold protectant, cleaning solvent, and molded plastic employed in this emissions unit (i.e., (c)/(d)), in pounds per hour.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. an identification of any monthly record showing OC emissions from the mold release, mold cleaner, mold protectant, and cleaning solvents exceeded 4.67 tons of OC per rolling, 12-month period from emissions units P348 and P313 combined; and

d. an identification of any monthly record showing OC emissions from the molded plastic exceeded 3.06 tons of OC per rolling, 12-month period from emissions units P348 and P313 combined.

These quarterly reports shall be submitted to the Ohio EPA, Central District Office in accordance the Standard Terms and Conditions of this permit.

(2) The permittee shall submit annual reports by April 15th which specify the total OC emissions from this emissions unit for the previous calendar year. These emissions may be reported per machine, as an average of P348 and P313, or may be included as a total of all machines. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report due by April 15th of each year.

f) Testing Requirements

(1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitations**:**

3.06 tons of OC/rolling, 12-month period from molding plastics on P348 and P313 combined.

4.67 tons of OC/per rolling, 12-month period from mold release, mold cleaner, mold protectant, and cleaning solvents used on P348 and P313 combined.

Applicable Compliance Method**:**

Compliance with these rolling 12-month limitations may be determined through the record keeping specified in Section d)(1)h. and d)(1)i. above.

U.S. EPA Method 24 or formulation data for the mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic shall be used to determine the OC content of the materials to be used in the calculation of emissions.

b. Emission Limitations:

8 pounds OC/hr and 40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Determination:

Compliance may be determined by the record keeping specified in Sections d)(2)d. and d)(2)f. above.

g) Miscellaneous Requirements

(1) None.