



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/1/2011

Certified Mail

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

| | |
|----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0107750
Permit Type: Administrative Modification
County: Union

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Honda of America Mfg., Inc., Marysville Auto Plant

| | |
|----------------|-----------------------------|
| Facility ID: | 0180010193 |
| Permit Number: | P0107750 |
| Permit Type: | Administrative Modification |
| Issued: | 6/1/2011 |
| Effective: | 6/1/2011 |



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

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. R200, POPA Primer Booth & Oven 14
2. R201, POPA Topcoat Process 22



Authorization

Facility ID: 0180010193
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): M0001150
Permit Number: P0107750
Permit Description: This permit is an administrative modification to PTI 01-08167 to correct the allowable emission limitations associated with natural gas combustion for emission units R200 and R201 (the Plastics Operations Painting Applications (POPA) plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO) due to an error on a previous permit application. This increase in the allowable emission rate and associated revision to the PSD review in the original permit does not alter the final outcome of the PSD review (i.e. the PSD significance levels are not exceeded).
Permit Type: Administrative Modification
Permit Fee: \$200.00
Issue Date: 6/1/2011
Effective Date: 6/1/2011

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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107750

Permit Description: This permit is an administrative modification to PTI 01-08167 to correct the allowable emission limitations associated with natural gas combustion for emission units R200 and R201 (the Plastics Operations Painting Applications (POPA) plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO) due to an error on a previous permit application. This increase in the allowable emission rate and associated revision to the PSD review in the original permit does not alter the final outcome of the PSD review (i.e. the PSD significance levels are not exceeded).

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

| | |
|-----------------------------------|--------------------------|
| Emissions Unit ID: | R200 |
| Company Equipment ID: | POPA Primer Booth & Oven |
| Superseded Permit Number: | 01-08167 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R201 |
| Company Equipment ID: | POPA Topcoat Process |
| Superseded Permit Number: | 01-08167 |
| 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 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 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 by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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 new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

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.
2. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP: R200 and R201. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Central District Office.

C. Emissions Unit Terms and Conditions



1. R200, POPA Primer Booth & Oven

Operations, Property and/or Equipment Description:

Primer Booth for POPA plastic parts coating lines, with infrared oven, natural gas oven, and/or dehumidification system

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 operation(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 are identified below. 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(A)(3) | <p>Volatile organic compound (VOC) emissions from the application and drying of waterborne primer coatings in the primer booth shall not exceed 17.44 pounds per hour (lbs/hr).</p> <p>VOC emissions from the application and drying of solvent-based repaint primer shall not exceed 183.46 lbs/hr.</p> <p>See Section b)(2)b. below.</p> <p>Particulate emissions (PE) from the overspray of POPA coatings shall not exceed 10.82 tons per year (tons/yr) from emission units R200 and R201.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).</p> <p>Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:</p> |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| | | 5.04 lbs nitrogen oxide (NOx) per hr 19.48 tons NOx/yr 4.24 lbs carbon monoxide (CO)/hr 16.36 tons CO/yr 0.10 lb filterable PE/hr 0.37 ton filterable PE/yr 0.28 lb VOC/hr 1.07 ton VOC/yr 0.03 lb sulfur dioxide (SO ₂)/hr 0.12 ton SO ₂ /yr |
| b. | OAC rule 3745-21-07(G) | Exempt from the limitations in 3745-21-07(G)(2) by using only nonphotochemically reactive materials or material exempt under 3745-21-07(G)(9). See Section b)(2)a. and b)(2)f. below. |
| c. | OAC rule 3745-31-05(D) | VOC emissions from coatings, solvent, and cleanup/purge materials usage shall not exceed 107 tons per rolling 12 months from emission units R200 and R201. See Section c)(2) below. |
| d. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule. |
| e. | OAC rule 3745-17-11(B)(1) | PE from overspray in R200 shall not exceed 0.98 lb/hr. |
| f. | 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) | The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR Part 63.4490. Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. |

(2) Additional Terms and Conditions

- a. This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).



- b. The hourly VOC emission limitations were established to reflect the potential to emit for each type of coating employed in this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensure compliance with these emission limitations.
- c. The use of solvent-based repaint primer on all coated parts is not a typical operation for this emissions unit. However, in some cases it may be necessary to temporarily coat all parts with solvent-based repaint primer in order to maintain production.
- d. Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 50.44 MMBTU/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.
- e. To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.
- f. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

[b)(1)b., b)(2)a., e)(1)a.]

c) Operational Restrictions

- (1) The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit.
- (2) The maximum coating, solvent, and cleanup/purge usage for emissions units R200 and R201 combined shall be limited by the following formula, calculated as a rolling, 12-month period:

$$107 \text{ TPY of VOC} \geq (1 - \text{DRE})(\text{CE})(\text{RE}) \times \frac{\{\sum (\text{VOC}_i)(U_i) - \text{Recovery Credit } i\}}{2000 \text{ lbs/ton}} + \frac{\{\sum (\text{VOC}_j)(U_j) - \text{Recovery Credit } j\}}{2000 \text{ lbs/ton}}$$

where,

DRE = destruction removal efficiency of the incinerator

RE = removal efficiency of the concentrator

CE = capture efficiency of the concentrator

VOC_i = organic compound content (lb/gal) of coating i, solvent i, and purge/cleanup i, applied to R201

U_i = usage (gallons) of coating i, solvent i, and purge/cleanup i, applied to R201

Recovery Credit i = pounds of VOC recovered from purge solvent recovery applied to R201

VOC_j = organic compound content (lb/gal) of coating j, solvent j, and purge/cleanup j, applied to R200

U_j = usage (gallons) of coating j, solvent j, and purge/cleanup j, applied to R200

Recovery Credit j = pounds of VOC recovered from purge solvent recovery applied to R200

- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart PPPP, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.4480-63.4581.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for the POPA coating operations (R200 and R201):
- a. the company identification for each coating, solvent, and cleanup/purge material employed;
 - b. the number of gallons of each coating, solvent, and cleanup/purge material employed;
 - c. the organic compound content of each coating, solvent, and cleanup/purge material, in pounds per gallon;
 - d. the total VOC emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;
 - e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (from Section d)(2)e. below);
 - f. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) - (e)); and
 - g. the rolling 12-month total VOC emissions from the coatings, solvent, and purge/cleanup materials employed in the POPA coating operations, including emissions units R200 and R201.

- (2) If a credit for recovered materials is used in Section d)(1) above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:
 - a. the date the material is removed from the POPA recovery tank(s);
 - b. the date the materials from the POPA recovery tank(s) were shipped off site;
 - c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;
 - d. the VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and
 - e. the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge and cleanup materials employed, in pounds or tons.
 - (3) The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit.
 - (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4480-63.4581.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any record showing the application of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) in this emission unit;
 - b. any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit; and
 - c. any record of an exceedance of the 12-month rolling VOC emission limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit annual reports which specify the total emissions of particulates and volatile organic compounds from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
 - (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4480-63.4581.

f) Testing Requirements

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

a. Emission Limitation

Visible PE from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation

107 tons VOC per rolling 12 months from R200 and R201 combined

Applicable Compliance Method

Compliance with this emission limitation may be determined by the record keeping specified in Section d)(1)g. above. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings, reducing solvents, cleanup and purge materials.

c. Emission Limitation

17.44 lbs VOC /hr from waterborne primer coatings
183.46 lbs VOC /hr from solvent-based repaint primer coatings

Applicable Compliance Method

The hourly VOC limitations were established by multiplying the maximum hourly coating usage for each material (14.53 gallons of waterborne primer and 30.164 gallons of solvent-based repaint primer) by the maximum VOC content for each material (1.2 lbs VOC/gal for waterborne primer and 6.082 lbs VOC/gal for solvent-based repaint primer).

d. Emission Limitations

Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

5.04 lbsNO_x/hr
19.48 tons NO_x/yr
4.24 lb CO/hr
16.36 tons CO/yr
0.10 lb filterable PE/hr
0.37 ton filterable PE/yr

0.28 lb VOC/hr
1.07 ton VOC/yr
0.03 lb SO₂/hr
0.12 ton SO₂/yr

Applicable Compliance Method

These limits represent the maximum capacity of the burners of all the drying ovens, the air supply units, the concentrator(s), and the RTO for the POPA operations. These emission limitations were determined by multiplying the maximum natural gas usage from all these burners (50,435 ft³/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The RTO burners shall be fueled by the volatile organic compounds, for which they were installed to control and supplemental natural gas from the fuel injector. It is estimated that the RTO burner shall require no more than 50 hours of natural gas fuel to begin combustion. Other than the RTO burner, the remaining hourly natural gas usage was multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

e. Emissions Limit

0.98 lb PE/hr from overspray in the primer booth;

PE from the overspray of coatings shall not exceed 10.82 tons/yr from emission units R200 and R201.

Compliance Method

Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections c)(1), d)(3), and e)(2) above. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

Compliance with the annual limit shall be based on meeting the requirements for the downdraft air systems specified under Sections c)(1), d)(3), and e)(2) for emissions units R200 and R201, and submitting annual reports or Fee Emission Reports with the calculated emissions of particulate matter, derived from material usage records, at the end of each year.

f. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4490.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-63.4581).

- g) Miscellaneous Requirements
 - (1) None.



2. R201, POPA Topcoat Process

Operations, Property and/or Equipment Description:

POPA topcoat process with coating booths, natural gas-fired air supply, oven, concentrator and RTO control

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 operation(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 are identified below. 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(A)(3) | <p>VOC emissions from the application and drying of coatings in shall not exceed 33.76 lbs/hr.</p> <p>PE from the overspray of POPA coatings shall not exceed 10.82 tons/yr from emission units R200 and R201.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).</p> <p>Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:</p> <p>5.04 lbsNOx/hr; 19.48 tons NOx/yr; 4.24 lbs CO/hr; 16.36 tons CO/yr; 0.10 lb filterable PE/hr; 0.37 ton filterable PE/yr; 0.28 lb VOC/hr;</p> |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| | | 1.07 ton VOC/yr; 0.03 lb SO ₂ /hr; 0.12 ton SO ₂ /yr. |
| b. | OAC rule 3745-21-07(G) | Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9). See Section b)(2)a. and b)(2)e. below. |
| c. | OAC rule 3745-21-07(M)(3)(d)(vi) | See Section b)(2)b. and b)(2)e. below |
| d. | OAC rule 3745-31-05(D) | VOC emissions from the application and drying of coatings, and from the cleanup, and purge materials usage shall not exceed 107 tons per rolling 12 months from emission units R200 and R201. See Section c)(2) below. |
| e. | OAC rule 3745-17-07(A)(1) | Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule. |
| f. | OAC rule 3745-17-11(B)(1) | PE from overspray in R201 shall not exceed 1.49 lb/hr. |
| g. | 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) | The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR Part 63.4490. Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. |

(2) Additional Terms and Conditions

- a. This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).
- b. This emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07 provided that the emissions unit is equipped with capture and control equipment that provide not less than an eighty-one percent reduction, by weight, in the overall volatile organic compound emissions from the application and drying of plastic part coatings within this emissions unit. For any reductions that are achieved by incineration, the

incineration equipment shall provide not less than ninety percent, by weight, destruction (control) efficiency.

- c. Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 50.44 MMBTU/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.
- d. To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.
- e. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

[b)(1)b., b)(2)a., e)(1)]

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

[b)(1)c. and b)(2)b.]

c) Operational Restrictions

- (1) The VOC emissions from this emissions unit shall be collected by a concentrator and vented to a regenerative thermal oxidizer (RTO), which together shall reduce VOC emissions from these coating operations by an estimated 83.9% based on engineering design calculations.

Emissions testing for the RTO was conducted on August 20-22, 2008 and demonstrated an overall VOC emission reduction of 92.7%. The most recent emissions test data should be used to calculate actual emissions and demonstrate compliance with the applicable limits contained in this permit.

- (2) The maximum coating, solvent, and cleanup/purge usage for emissions units R200 and R201 combined shall be limited by the following formula, calculated as a rolling, 12-month period:

$$107 \text{ TPY of VOC} \geq (1 - \text{DRE})(\text{CE})(\text{RE}) \times \frac{\{\sum (\text{VOC}_i)(\text{U}_i) - \text{Recovery Credit } i\}}{2000 \text{ lbs/ton}} +$$

$$\frac{\{\sum (\text{VOC}_j)(\text{U}_j) - \text{Recovery Credit } j\}}{2000 \text{ lbs/ton}}$$

where,

DRE = destruction removal efficiency of the incinerator

RE = removal efficiency of the concentrator

CE = capture efficiency of the concentrator

VOC_i = organic compound content (lb/gal) of coating *i*, solvent *i*, and purge/cleanup *i*, applied to R201

U_i = usage (gallons) of coating *i*, solvent *i*, and purge/cleanup *i*, applied to R201

Recovery Credit *i* = pounds of VOC recovered from purge solvent recovery applied to R201

VOC_j = organic compound content (lb/gal) of coating *j*, solvent *j*, and purge/cleanup *j*, applied to R200

U_j = usage (gallons) of coating *j*, solvent *j*, and purge/cleanup *j*, applied to R200

Recovery Credit *j* = pounds of VOC recovered from purge solvent recovery applied to R200

- (3) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, or below 1200 degrees Fahrenheit until such time of testing.
- (4) The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit.
- (5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart PPPP, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.4480-63.4581.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information for each month for emissions units R200 and R201:
- the company identification for each coating, solvent, and cleanup/purge material employed;
 - the number of gallons of each coating, solvent, and cleanup/purge material employed;
 - the organic compound content of each coating, solvent, and cleanup/purge material, in pounds per gallon;

- d. the total VOC emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;
 - e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (from Section d)(2)e. below);
 - f. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) - (e));
 - g. the controlled net VOC emissions from all coatings, coating components, and cleanup/purge materials employed, in pounds or tons per month (based on the most recent emissions testing); and
 - h. the rolling 12-month total VOC emissions from the coatings, solvent, and purge/cleanup materials employed in the POPA coating operations, including emissions units R200 and R201.
- (2) If a credit for recovered materials is used in Section d)(1) above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:
- a. the date the material is removed from the POPA recovery tank(s);
 - b. the date the materials from the POPA recovery tank(s) were shipped off site;
 - c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;
 - d. the VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and
 - e. the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge and cleanup materials employed, in pounds or tons.
- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. 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.
- (4) The permittee shall collect and record the following information each day for the control equipment:
- a. for the RTO and concentrator, a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

- b. all 3-hour blocks of time during which the average combustion temperatures within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance, or below 1200 degrees Fahrenheit until such time of testing.
 - (5) The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit.
 - (6) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4480-63.4581.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any record showing the application of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) in this emission unit;
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified above;
 - c. any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit; and
 - d. any record of an exceedance of the 12-month rolling VOC emission limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit annual reports which specify the total emissions of particulates and volatile organic compounds from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
 - (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4480-63.4581.
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation

Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation

107 tons VOC per rolling 12 months from R200 and R201 combined

Applicable Compliance Method

Compliance with this emission limitation may be determined by the record keeping specified in Section d)(1)g. above. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings, reducing solvents, cleanup and purge materials.

c. Emission Limitations

Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

5.04 lbsNO_x/hr
19.48 tons NO_x/yr
4.24 lb CO/hr
16.36 ton CO/yr
0.10 lb filterable PE/hr
0.37 ton filterable PE/yr
0.28 lb VOC/hr
1.07 ton VOC/yr
0.03 lb SO₂/hr
0.12 ton SO₂/yr

Applicable Compliance Method

These limits represent the maximum capacity of the burners of all the drying ovens, the air supply units, the concentrator(s), and the RTO for the POPA operations. These emission limitations were determined by multiplying the maximum natural gas usage from all these burners (50,435 ft³/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The RTO burners shall be fueled by the volatile organic compounds, for which they were installed to control, and supplemental natural gas from the fuel injector. It is estimated that the RTO burner shall require no more than 50 hours of natural gas fuel to begin combustion. Other than the RTO burner, the remaining hourly natural gas usage was multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emissions Limit

1.49 lb PE/hr from overspray in R201;

PE from the overspray of coatings shall not exceed 10.82 tons/yr from emission units R200 and R201

Compliance Method

Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections c)(4), d)(5), and e)(3). If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

Compliance with the annual limit shall be based on meeting the requirements for the downdraft air systems specified under Sections c), d), and e) for emissions units R200 and R201, and submitting annual reports or Fee Emission Reports with the calculated emissions of particulate matter, derived from material usage records, at the end of each year.

e. Emission Limitation

33.76 lbs VOC/hr

Compliance Method

Initial emissions testing was conducted on December 17 and 18, 2002. Additional testing was conducted on August 20-22, 2008.

If required, the permittee shall conduct, or have conducted, emission testing and develop a mass balance demonstration of organic compound emissions for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted to demonstrate compliance with the hourly emission limit, through a mass balance demonstration, and to document the overall reduction of VOC emissions from the coating operations, after actual control and capture efficiencies are measured;
- ii. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1 for sample and velocity traverses; Method 2 for velocity and volumetric flow rates; Method 24 for the VOC content of the coating; Methods 25 or 25A for destruction efficiency after the RTO; Methods 18, 25 or 25A for the VOC concentration in the effluent gas leaving the concentrator; and Methods 204A through F for the capture efficiency of the concentrator. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; or, any Method of testing may be required/requested by the Administrator; and
- iii. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Central District Office.

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

f. Emission Limitation

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR Parts 63.4490.

Applicable Compliance Method

See 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-63.4581).

g) Miscellaneous Requirements

- (1) None.