State of Ohio Environmental Protection Agency

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

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

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

RE: FINAL PERMIT TO INSTALL
UNION COUNTY
Application No: 01-06635

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 6/7/2001

Honda of America Manufacturing, Inc.
Cory Sander
24000 Honda Parkway
Marysville, OH 430409190

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**

FINAL PERMIT TO INSTALL 01-06635

Application Number: 01-06635

APS Premise Number: 0180000130

Permit Fee: **$200**

Name of Facility: Honda of America Manufacturing, Inc.

Person to Contact: Cory Sander

Address: 24000 Honda Parkway
Marysville, OH 430409190

Location of proposed air contaminant source(s) [emissions unit(s)]:
24000 Honda Pkwy
Marysville, Ohio

Description of proposed emissions unit(s):
Modification of application testing facility coating test booth paint booth with natural gas drying oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. 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.

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

2. Scheduled Maintenance/Malfunction Reporting

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

3. 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.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

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

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

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

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

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

9. Compliance Requirements

a. 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.

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

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

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If 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 <u>obtained before</u> 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

7. 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.

8. 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).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	13.9*
NO_x	13.2
CO	3.3
PM	0.73

*This represents an increase in VOC emissions of 7.65 tons per year from this source. The drying oven was not included in previously permitted limits.

Part II -Facility Specific Terms and Conditions

A. State and Federally Enforceable Permit To Install Facility Specific Terms and conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - Special Terms and Conditions for Specific Emissions Unit(s)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Application Testing Facility (ATF) coating operations with natural gas drying burners and electric drying oven	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 13.4 tons OC per rolling 12-months; The volatile organic compound content shall not exceed 4.6 lbs VOC/gal of coating as a monthly volume-weighted average when coating metal parts and components; The net coating and cleanup material usage shall not exceed 5,290 gallons per rolling 12-month (in any combination of waterborne or solvent borne coatings), see A.I.2.b; The emissions from the natural gas drying oven shall not exceed: 0.30 lb PM/hr 1.32 tons PM/yr 3.02 lbs NOx/hr 13.2 tons NOx/yr 0.76 lb CO/hr 3.31 tons CO/yr 0.01 lb SO_2/hr 0.06 tons SO_2/yr

	0.13 lb OC/hr 0.55 ton OC/yr
OAC rule 3745-31-05(A)(3)	See Section A.II.2.
OAC rule 3745-21-07(G)(9)	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) when coating plastic parts;
OAC rule 3745-21-09 (U)(2)(f)(ii)	Best available technology has been established to be less stringent than the requirements in 3745-21-09(U)(1);
OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 pounds per hour nor 2.41 tons per year; and
OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

2.a In order to test the spray applicator's effect, coatings being tested in ATF can be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of ATF test coatings in the Final Repair paint booth as part of the emissions calculated for this emissions unit (ATF).

2.b Net gallons and OC emissions shall be calculated using the difference between materials (coating and cleanup) used, minus materials collected for off-site recovery, recycle, and/or disposal. This may include any combination of waterborne and solvent borne coatings and cleanup materials. A monthly composite sample of solvent borne and waterborne (when used) materials shall each be collected and tested (on or off-site), using Method 24, to determine the volatile content. The OC emissions credit shall be calculated using the monthly test result(s) along with the amount of material each composite sample represents. The credit shall be applied during the month in which the

material is shipped off-site. Materials not included as "used in the emissions unit" (unused/untested containerized coatings) shall also not be included in the credit to these emissions and material use (gallons)**.**

2.c When coating non-metal parts this emissions unit shall use only nonphotochemically reactive material or materials exempt per OAC 3745-21-07(G)(9).

II. Operational Restrictions

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month coating usage (gallons/rolling twelve-months) and OC emissions shall be calculated based upon the actual coating usage and OC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.

2. The permittee shall operate the downdraft whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

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

   a. the name and identification number of each coating and cleanup material employed, documentation on the chemical content of each (e.g. MSDS), and the material(s) to which they were employed (metal or non-metal);

   b. the OC content and the number of gallons (or part gallon) of each coating and cleanup material applied to non-metal parts (as applied);

   c. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating applied to metal parts;

   d. the VOC content and number of gallons (or part gallon) of each cleanup material employed to metal parts;

   e. the amount of cleanup material and coating collected and shipped for re-cycle and/or disposal at an outside facility; materials not included as "used in the emissions unit" (unused/untested containerized coatings) shall not be included in the credit to these emissions and material use (gallons)**;**

   f. the total rolling 12-month net usage of coating and cleanup material in gallons (total gallon usage minus materials collected and shipped for re-cycle and/or disposal at outside facility during the month); and

g. the total rolling 12-month OC emissions from all coatings and cleanup materials, in tons.

2. The permittee shall maintain daily records that document any time periods when the downdraft was not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

   a. any monthly record showing the monthly volume-weighted average VOC content, when coating metal parts, exceeding 4.6 pounds of VOC per gallon of coating;

   b. any monthly record of an exceedance of the 12-month rolling OC emissions limit or 12-month rolling usage limit of coatings and cleanup material; and

   c. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9) on plastic and/or non-metal parts/components, including an identification of the material used, it's composition, and the day(s) and duration of time the material was used.

2. The permittee shall notify the Ohio EPA Central District Office of any daily record showing that the downdraft was not in service when the emissions unit was in operation. This notification shall be reported as per the requirements found in 3745-15-06(B).

3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

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

1. <u>Emission Limitation</u>

   13.4 tons OC per rolling 12 months

   <u>Applicable Compliance Method</u>

   Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of coating usage, the organic compound content of each coating used, and the rolling 12-month summation of calculated OC emissions. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the coatings, to be used in the calculation of

emissions. Compliance test methods and procedures shall follow those specified in OAC rule 3745-21-10(B). Twelve month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations from the emissions unit to the previous 11 month's emission calculations.

2. Emission Limitation

5,290 net gallons of coating and cleanup material per rolling 12 months

Applicable Compliance Method

Compliance with the rolling 12-month net gallon coating and cleanup material usage limit shall be determined through monthly and 12-month rolling recordkeeping of coating and cleanup material usage and the amount of materials collected for re-cycle and/or outside disposal. Materials that were previously recorded as used and included in the emission calculations for the emissions unit, that are tightly covered and collected for re-cycle and/or disposal at an outside facility, may be subtracted from the total gallon usage record during the month that it is shipped offsite.

3. Emission Limitation

4.6 lbs. VOC/gallon of coating as a monthly volume weighted average when coating metal parts

Applicable Compliance Method

Compliance with this volume weighted average limit shall be determined through monthly recordkeeping of coating usage on metal parts, the organic compound content of each coating used, and the calculated average VOC content per gallon of coatings applied to metal parts. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the coatings, to be used in the calculation of emissions.

4. Emission limitation from natural gas drying oven

0.30 lb PM/hr
1.32 tons PM/yr
3.02 lbs NOx/hr
13.2 tons NOx/yr
0.76 lb CO/hr
3.31 tons CO/yr

0.01 lb SO_2/hr
0.06 tons SO_2/yr
0.13 lb OC/hr
0.55 ton OC/yr

Applicable Compliance Method

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the natural gas usage (MM ft3) by the emission factors for each pollutant (lbs./MM ft3) found in the 10/96 edition of AP-42, Tables 1.4-1, 1.4-2, and 1.4-3. Since these limits represent the maximum capacity of the equipment, no additional compliance determination is required.

5. Emission limitation

0.551 pound PM/hour
2.41 ton PM/year

Applicable Compliance Method

Compliance with the hourly and annual PM emission limits shall be determined through maintaining records of the historical worst case solids content and highest density coating used in this emissions unit. Formulation data from each manufacture's MSDS shall be used to demonstrate that all new coatings do not exceed the worst case maximum solids content of 73%, as applied, or worst case density of 11.36 pounds per gallon, as applied. Maximum hourly and annual emissions shall be calculated by multiplying the maximum coating usage (2.65 gal/hr and 5,290 gal/yr) times the worst case solids content (73%) times the worst case coating density (11.36 lbs/gal), and including the transfer and control efficiencies; calculations shall be documented as follows:

PM emissions/hr = (maximum coating usage/hr) x (maximum coating density) x (maximum solids content) x (1-TE) x (1-CE)

0.549 lb PM/hr = (2.65 gal/hr) x (11.36 lbs/gal) x (73% solids) x (1-50%) x (1-95%)

Annual PM emissions (in tons/yr) = (maximum coating usage/year) x (maximum coating density) x (maximum solids content) x (1-TE) x (1-CE) x (1 ton/2000 lbs)

0.55 ton PM/yr = (5,290 gal/yr) x (11.36 lbs/gal) x (73% solids) x (1-50%) x (1-95%) x (1 ton/2000 lbs)

TE = transfer efficiency (50% for electrostatic, air-atomized spray, or manual application)

CE = control efficiency (95% for downdraft control)

6. Emission limitation

Visible particulate emissions shall not exceed twenty percent 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).

VI. Miscellaneous Requirements

This PTI (01-6635) supercedes the requirements found in PTI #01-3474 for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Application Testing Facility (ATF) coating operations with natural gas drying burners and electric drying oven	OAC rule 3745-31-05	160.6 lbs. OC/day; see B.I.2.

2. Additional Terms and Conditions

The daily OC limit was established at maximum usage and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Emission Limitation

160.6 lbs. OC/day

Applicable Compliance Method

This limit was established at maximum coating and material usage to establish compliance with the Ohio EPA's "Air Toxics Policy", therefore no recordkeeping or calculations are required to determine compliance with this limit. This limit was established by multiplying the maximum calculated OCs emissions per hour times 24 hours in a day or:

6.69 pounds OCs/hour x 24 hour/day =160.6 lbs. OC/day

VI. Miscellaneous Requirements

Ohio Air Toxic Policy

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.