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**
**SHELBY COUNTY**
**Application No:** 05-12998

**CERTIFIED MAIL**

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

**DATE:** 12/9/2003

Honda of America Mfg Inc
Paul Huwer
12500 MERANDA RD
ANNA, OH 453029699

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

**CC: USEPA** **SWDO**

# FINAL PERMIT TO INSTALL 05-12998

Application Number: 05-12998

APS Premise Number: 0575000174

Permit Fee: **$750**

Name of Facility: Honda of America Mfg Inc

Person to Contact: Paul Huwer

Address: 12500 MERANDA RD
ANNA, OH 453029699

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12500 Meranda Rd**
**Anna, Ohio**

Description of proposed emissions unit(s):
**1000 ton cold forging press.**

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.9 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 ninety (90) 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.

**12. 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.

## 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

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

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

### 4. 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.

### 5. 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.

**6. 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.

**7. 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).

**8. 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.

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

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

## 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 |
|---|---|
| **PE** | **0.68** |
| **OC** | **15.78** |

## 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 |
|---|---|---|
| P088 - 1,000 ton cold forging press with particulate collector | OAC rule 3745-31-05(A)(3) | 0.15 lb of particulate emissions (PE) /hr<br>0.68 tons of PE/yr<br><br>6.18 lbs of organic compound (OC)/hr<br>15.78 tons of OC/yr<br><br>0.03 grain of PE/dscf<br><br>Visible emissions from the stack shall not exceed 0% opacity<br><br>Organic compound emissions shall not exceed 6.18 lbs OC/hr and 40 lbs OC/day when using photochemically reactive materials. |
| | OAC rule 3745-21-07(G)(2) | The OC limitation specified by this rule is less stringent than the OC limitation established pursuant to OAC rule 3745-31-05 (A)(3) |
| | OAC rule 3745-17-07(A)(1) | The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05 (A)(3) |
| | OAC rule 3745-17-11(B)(1) | The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05 (A)(3) |

**2. Additional Terms and Conditions**

**2.a** Best Available Technology (BAT) has been determined to be the use of a particulate collector to control PE emissions from this unit.

## II. Operational Restrictions

1. The permittee shall operate a particulate collector when the unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day the emission unit is in operation and when using material not exempted in Ohio Administrative Code (OAC) rule 3745-21-07 (G)(9):

   a. for each day during which a photochemically reactive material is employed, the company identification for each coating and photochemically reactive material employed.

   b for each day during which a photochemically reactive material is employed, the calculated number of gallons of each release agent.

   c. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all release agents in pounds per day.

   d. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

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

   a. the location and color of the emissions;

   b. the cause of the visible emissions;

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

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

   If after six months there is no deviation of the visible emission limitation for this emissions unit, then the frequency of the checks may change from weekly to monthly.

## IV. Reporting Requirements

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

   a. For the days during which a photochemically reactive material was employed, an identification of each hour during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 6.18 pounds per hour, and the actual organic compound emissions for each such hour.

   b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   c. The report, as denoted in terms A.IV.1, is due by the date described in Part 1- General Terms and Conditions of the permit under section (A)(1).

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

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

   a. Emission Limitation:
   0.15 lb of particulate emissions ( PE)/hour

   Applicable Compliance Method:
   Compliance shall be demonstrated based both on the operating requirements in term A.II. and the following calculation:

   (PCEF)x(EFF)x(TCONV)x(1-BCEF)x(GCONV) = 0.15 lb of PE per hour

   where

   PCEF = the Particulate Control Exhaust Flowrate (Maximum 2000 acfm based on specifications from Manufacturer.)
   EFF = the Particulate Control Exhaust Efficiency (0.03 grains/dscf) based on design specifications from the manufacturer.
   TCONV = Time Conversion Factor (60 minutes/hour).
   BCEF = Building Capture Efficiency (70%) Reference: April 10,1998 Letter to Ironton Iron Inc. from Stephen Giles-Director of Portsmouth Local Air Agency

GCONV = Grain Conversion Factor (1 lb/7,000 grains)

(No hourly recordkeeping required. Limits based on the maximum designed capacity of the equipment.)

b. Emission Limitation:

0.68 tons of PE/yr

Applicable Compliance Method:
Compliance shall be demonstrated based both on the operating requirements in term A.II. and the following calculation:

(PCEF)x(EFF)x(TCONV)x(GCONV)x(AOH)x(1-BCEF)x(CONV) = 0.68 tons of PE/yr

where

PCEF = the Particulate Control Exhaust Flowrate (Maximum 2000 acfm based on specifications from Manufacturer.)
EFF = the Particulate Control Exhaust Efficiency (0.03 grains/dscf) based on design specifications from the manufacturer.
TCONV = Time Conversion Factor (60 minutes/hour)
GCONV = Grain Conversion Factor (1 lb/7,000 grains).
BCEF = Building Capture Efficiency (70%) Reference: April 10,1998 Letter to Ironton Iron Inc. from Stephen Giles-Director of Portsmouth Local Air Agency
AOH = Annual Operating Hours (8760 hours/year)
CONV= conversion factor (1 ton/2000 lbs)

(No hourly recordkeeping required. Limits based on the maximum designed capacity of the equipment.)

c. Emission Limitation:

6.18 lb of OC/hr

Applicable Compliance Method:

SER + LER + BER = 6.18 lb of OC/hr-(stack emissions)

where

SER = the Solvent Emission Rate from the binder (4.12 lb of OC/hr.)
LER = the Lubricant Emission Rate (0.57 lb of OC/hr.)
BER = the Bonderlube Emission Rate (1.49 lbs of OC/hr.)

where

SER= (DU)x(DEN)x(VOL)÷(HPD)= 4.12 lb of OC/hr.

DU= Daily Usage of solvent per day (15 gallons per day)
DEN = Density of material (6.59 lbs per gallon based on MSDS of current material)
VOL = Percent Volatile of the material (100 % based on MSDS of current material)
HPD = Hours Per Day of operation (24 hours per day)

where

LER= (DU)x(DEN)x(VOL)÷(HPD)= 0.57 lb of OC/hr.

DU= Daily Usage of Lubricant per day (2 gallons per day)
DEN = Density of material (7.84 lbs per gallon based on MSDS of current material)
VOL = Percent Volatile of the material (88 % based on MSDS of current material)
HPD = Hours Per Day of operation (24 hours per day)

where

BER= (DU)x(DEN)x(VOL)÷(HPD)= 1.49 lb of OC/hr.

DU= Daily Usage of Bonderlube per day (12 gallons per day)
DEN = Density of material (8.5 lbs per gallon based on estimate of material to be used)
VOL = Percent Volatile of the material (35 % based on estimate of material to be used)
HPD = Hours Per Day of operation (24 hours per day)

**This limit represents the maximum capacity of this source. Since this limit represents the maximum designed throughput capacity of this source, no additional compliance determination is required.

d. Emission Limitation:

15.78 tons of OC/yr

<u>Applicable Compliance Method:</u>

SER + LER + BER = 15.78 tons of OC/yr

where

SER = the Solvent Emission Rate from the binder (7.91 tons of OC/yr.)
LER = the Lubricant Emission Rate (1.45 tons of OC/yr.)
BER = the Bonderlube Emission Rate (6.43 tons of OC/yr.)

where

SER= (MU)x(DEN)x(VOL)x(CONV)x(MPY) = 7.91 tons of OC/yr.

MU= Monthly Usage of solvent (200 gallons per month)
DEN = Density of material (6.59 lbs per gallon based on MSDS of current material)
VOL = Percent Volatile of the material (100 % based on MSDS of current material)
CONV= conversion factor (1 ton/2000 lbs)
MPY = Months per Year of operation (12 months per year)

where

LER= (MU)x(DEN)x(VOL)x(CONV)x(MPY) = 1.45 tons of OC/yr.

MU= Monthly Usage of lubricant (35 gallons per month)
DEN = Density of material (7.84 lbs per gallon based on MSDS of current material)
VOL = Percent Volatile of the material (88 % based on MSDS of current material)
CONV= conversion factor (1 ton/2000 lbs)
MPY = Months per Year of operation (12 months per year)

where

BER= (MU)x(DEN)x(VOL)x(CONV)x(MPY) = 6.43 tons of OC/yr.

MU= Monthly Usage of Bonderlube (360 gallons per month)
DEN = Density of material (8.5 lbs per gallon based on estimate of material to be used)
VOL = Percent Volatile of the material (35 % based on estimate of material to be used)
CONV= conversion factor (1 ton/2000 lbs)
MPY = Months per Year of operation (12 months per year)

**This limit represents the maximum capacity of this source. Since this limit represents the maximum designed throughput capacity of this source, no additional compliance determination is required.

e. Emission Limitation:

0% opacity

Applicable Compliance Method:

If required, compliance shall be determined according to 40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building.

f. Emission Limitation:

6.18 pounds OC/hr when using photochemically reactive materials.
40 pounds per day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated use of mold release agents, the OC content of each material used, and the hours of operation of this emissions unit. Formulation data from the manufacturer may be used to determine the organic compound content of the mold release agents to be used in the calculation of emissions.

Hourly Emissions = See Section IV #5 & #6

Daily Emissions
40 pounds of photochemically reactive materials = GPD x OCC ÷ OH
GPD = Gallons of Parting Spray per Day
OCC = Volatile Organic Compound Content
OH = Operating Hours

## VI. Miscellaneous Requirements

None

## 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 |
|---|---|---|
| P088 - 1,000 ton cold forging press with particulate filter | OAC rule 3745-31-05 | Compliance with OEPA's Air Toxics Policy |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P087) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Acetone

   TLV (mg/m3): 500 ppm

   Maximum Hourly Emission Rate (lbs/hr): 4.12

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 138.5

   MAGLC (ug/m3): 28,265

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the

permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None