



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

5/14/2013

John Eckstein, MS
Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway
Marysville Automobile Plant
Marysville, OH 43040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0180010193
Permit Number: P0111797
Permit Type: Administrative Modification
County: Union

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Marysville Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

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

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

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO

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

Issue Date: 5/14/2013
Permit Number: P0111797
Permit Type: Administrative Modification
Permit Description: This is an administrative modification of PTI Nos. P0106970, P0104533, and P0104033 to replace the operational restrictions limiting the number of units processed per rolling 12-month period with equivalent operational restrictions that consist of equations to demonstrate compliance with volatile organic compound (VOC) and particulate emissions (PE) limitations. There is no change in the allowable emissions limits or PTE, only in the operational restrictions and the corresponding monitoring, recordkeeping, and reporting requirements.

Facility ID: 0180010193
Facility Location: Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway,
Marysville, OH 43040-9251

Facility Description: Automobile Manufacturing, Light Truck and Utility Vehicle Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: On October 11, 2012, Honda of America Mfg., Inc. – Marysville Auto Plant (Honda) submitted an application for the administrative modification of PTI Nos. P0106970, P0104533, and P0104033. Honda manufactures vehicles on two assembly lines and has numerous other various assemblies.

The application was made to replace the current operational restrictions of 490,000 units processed per rolling 12-month period, 245,000 units processed per rolling 12-month period, and 275,000 units processed per rolling 12-month period contained in the above referenced permits with equivalent operational restrictions that consist of equations to demonstrate compliance with volatile organic compound (VOC) and particulate emissions (PE) limitations. Due to reformulation over the years, the production restrictions contained in the permits no longer correlate to the emissions limitations in the permits, and the facility can now operate at a higher production rate while still remaining below the emissions limitations. Therefore, there is no change in allowable emissions limits or PTE, only in the operational restrictions and the corresponding monitoring, recordkeeping, and reporting requirements. Affected emissions units include: K201, K206, K208, K221, K222, K227, K228, K235, K236, K237, K238, K240, P004, P201, P205, P330, P341, P342, P343, P344, P346, R003, R102, and R103.

Other changes/updates made concurrently to the permit include:

- Added appropriate and consistent MACT references to affected sources where none or inconsistent references were included before; and
- Deleted references/requirements related to photochemically reactive solvents and OAC rule 3745-21-07 (which has since been repealed).

3. Facility Emissions and Attainment Status: The facility is classified as Title V due to emissions of volatile organic compounds (VOC) over the Title V threshold of 100 tons per year. The facility is also considered major for NSR purposes due to emissions of VOCs over the NSR (PSD) major stationary source threshold of 250 tons per year. Union County is currently in attainment for all criteria pollutants.
4. Source Emissions: There are no increases or decreases in the allowable emission rates associated with this administrative modification.
5. Conclusion: The issuance of PTI No. P0111797 is recommended.



DRAFT

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

for

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

Facility ID:	0180010193
Permit Number:	P0111797
Permit Type:	Administrative Modification
Issued:	5/14/2013
Effective:	To be entered upon final issuance



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	5
1. Federally Enforceable Standard Terms and Conditions	6
2. Severability Clause	6
3. General Requirements	6
4. Monitoring and Related Record Keeping and Reporting Requirements.....	7
5. Scheduled Maintenance/Malfunction Reporting	8
6. Compliance Requirements	8
7. Best Available Technology	9
8. Air Pollution Nuisance	9
9. Reporting Requirements	9
10. Applicability	10
11. Construction of New Sources(s) and Authorization to Install	10
12. Permit-To-Operate Application	11
13. Construction Compliance Certification	11
14. Public Disclosure	11
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	12
16. Fees.....	12
17. Permit Transfers	12
18. Risk Management Plans	12
19. Title IV Provisions	12
B. Facility-Wide Terms and Conditions.....	13
C. Emissions Unit Terms and Conditions	15
1. K201, PA Line 1 E-Coat	16
2. K206, PA Primer/Surfacer Line 1	29
3. K208, PA L1 Body Topcoat.....	40
4. Emissions Unit Group - Window Install Lines: K221, K222,.....	54
5. Emissions Unit Group - Wheel Well Blackout: K227, K228,.....	58
6. K235, Line 2 E-Coat.....	63
7. K236, New Line 2 Primer/Surfacer.....	75



8. K237, New Line 2 Topcoat	87
9. K238, New Line 2 Sealer/Deadner/LASD	99
10. K240, LASD Line 1	109
11. Emissions Unit Group - Main Body Welding Lines: P004, P330,	113
12. P201, PA Line 1 E-coat Sanding	120
13. P205, PA Line 1 primer/surfacer sanding	126
14. P341, New Line 2 Sludge Pit.....	131
15. P342, New Line 2 E-coat Sanding.....	135
16. P343, New Line 2 Surfacer Sanding	139
17. P344, Line 2 Repair Sanding	143
18. P346, PA Line 1 Repair Sanding.....	147
19. R003, PA Line 2 Inner-Cavity Wax Application.....	153
20. R102, PA Line 1 Sealer/Deadener Application	164
21. R103, PA Line 1 Inner-Cavity Wax Application.....	173



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0180010193
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): M0001960, M0001961, M0001962
Permit Number: P0111797
Permit Description: This is an administrative modification of PTI Nos. P0106970, P0104533, and P0104033 to replace the operational restrictions limiting the number of units processed per rolling 12-month period with equivalent operational restrictions that consist of equations to demonstrate compliance with volatile organic compound (VOC) and particulate emissions (PE) limitations. There is no change in the allowable emissions limits or PTE, only in the operational restrictions and the corresponding monitoring, recordkeeping, and reporting requirements.
Permit Type: Administrative Modification
Permit Fee: \$2,400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/14/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

Ohio Environmental Protection Agency (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: P0111797
Permit Description: This is an administrative modification of PTI Nos. P0106970, P0104533, and P0104033 to replace the operational restrictions limiting the number of units processed per rolling 12-month period with equivalent operational restrictions that consist of equations to demonstrate compliance with volatile organic compound (VOC) and particulate emissions (PE) limitations. There is no change in the allowable emissions limits or PTE, only in the operational restrictions and the corresponding monitoring, recordkeeping, and reporting requirements.

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

Emissions Unit ID:	K201
Company Equipment ID:	PA Line 1 E-Coat
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K206
Company Equipment ID:	PA Primer/Surfacer Line 1
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K208
Company Equipment ID:	PA L1 Body Topcoat
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K235
Company Equipment ID:	New Line 2 E-Coat
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K236
Company Equipment ID:	New Line 2 Primer/Surfacer
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K237
Company Equipment ID:	New Line 2 Topcoat
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K238
Company Equipment ID:	New Line 2 Sealer/Deadner/LASD
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K240
Company Equipment ID:	LASD Line 1
Superseded Permit Number:	P0104403
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P201
Company Equipment ID:	PA Line 1 E-coat Sanding
Superseded Permit Number:	P0106970



General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P205
Company Equipment ID:	PA Line 1 primer/surfacer sanding
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P341
Company Equipment ID:	New Line 2 Sludge Pit
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P342
Company Equipment ID:	New Line 2 E-coat Sanding
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P343
Company Equipment ID:	New Line 2 Surfacer Sanding
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P344
Company Equipment ID:	New Line 2 Repair Sanding
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P346
Company Equipment ID:	PA Line 1 Repair Sanding
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	PA Line 2 Inner-Cavity Wax Application
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R102
Company Equipment ID:	PA Line 1 Sealer/Deadener Application
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R103
Company Equipment ID:	PA Line 1 Inner-Cavity Wax Application
Superseded Permit Number:	P0106970
General Permit Category and Type:	Not Applicable

Group Name: Main Body Welding Lines

Emissions Unit ID:	P004
Company Equipment ID:	Welding Line 2
Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P330
Company Equipment ID:	Welding Line 1
Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable

Group Name: Wheel Well Blackout

Emissions Unit ID:	K227
Company Equipment ID:	Line 1 Wheel Well Blackout



Draft Permit-to-Install
 Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
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Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K228
Company Equipment ID:	Line 2 Wheel Well Blackout
Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable

Group Name: Window Install Lines

Emissions Unit ID:	K221
Company Equipment ID:	K221
Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K222
Company Equipment ID:	K222
Superseded Permit Number:	P0104533
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

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 emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart MM: K201, K206, K208, K235, K236, and K237. The complete NSPS requirements, including the NSPS 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 appropriate Ohio EPA District Office or local air agency.
3. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks (40 CFR Part 63, Subpart IIII) as an existing major source with a compliance date as specified in the final standard. The following emissions units contained in this permit are subject to 40 CFR 63, Subpart IIII: K201, K206, K208, K221, K222, K227, K228, K235, K236, K237, K238, K240, P004, P330, R003, and R102. 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 appropriate Ohio EPA District Office or local air agency.



Draft Permit-to-Install
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C. Emissions Unit Terms and Conditions



1. K201, PA Line 1 E-Coat

Operations, Property and/or Equipment Description:

Line 1 e-coat with gas-fired makeup air and oven

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)	Volatile organic compound (VOC) emissions shall not exceed 1.12 lbs/gallon of coating, as applied, excluding water and exempt solvents (free solvent). See b)(2)b. below Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lbs of particulate emissions (PE)/hr; 26.25 tons of PE/yr; 0.26 lb of sulfur dioxide (SO ₂)/hr; 1.16 tons of SO ₂ /yr; 46.93 lbs of nitrogen oxide (NO _x)/hr; 196.22 tons of NO _x /yr; 36.69 lbs of carbon monoxide (CO)/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(C)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)e. through b)(2)g. below.
b.	OAC rule 3745-31-05(D)	See b)(2)c. below
c.	OAC rule 3745-21-09(C)(1)(a)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.
- b. This emissions unit shall not exceed the following:
 - i. When the solids turnover ratio (R_T)* is 0.160 or greater:
 - (a) VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average; and



- (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.
- ii. When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:
 - (a) VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average.
- iii. When the solids turnover ratio (R_T)* is less than 0.040:
 - (a) No free solvent or total VOC emission limitation (lb/gallon of applied solids) is applicable.

* R_T is calculated in accordance with OAC rule 3475-21-09(C)(1)(a)(ii).

- c. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in b)(2)d. below, shall not exceed 1,176 tons VOC combined per rolling, 12-month period.
- d. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (on-line repair sanding, Line 1), P342 (Line 2 e-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)), Z355 (phosphating Line 2) and K240 (Line 1 LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in emissions estimations completed for demonstrating compliance with the emission limitation specified under b)(2)c. above.
- e. VOC emissions from the e-coat oven shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the e-coat oven is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
- f. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(1)e. below.



g. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature of the thermal incinerator when the e-coat oven is processing units (vehicles). 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 and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.
- (3) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_j = Destruction removal efficiency for emissions unit j (if applicable)

CE_j = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)



- (4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and maintain monthly records which contain the following information for materials added to the e-coat process:
- a. the name and identification of each coating and solvent added to the EDP system; and
 - b. the VOC content of each coating and solvent (excluding water and exempt solvents), as added to the EDP system, in lbs VOC/gal.
- (2) The permittee shall collect and maintain monthly records which contain the following information for materials added to the EDP system for the purpose of determining the contribution of coatings (resin and paste) and solvent employed in this emissions unit and to determine compliance with the rolling, 12-month Line 1/Line 2 VOC emission limitation and compliance with the pound of VOC/gal limitation specified in b)(1):
- a. the name and identification of each coating and solvent employed;
 - b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;
 - c. the number of gallons of each coating and solvent employed, in gallons;
 - d. the total VOC emissions from all coatings and solvent employed, (excluding cleanup and purge materials maintained in d)(3) and d(4) in pounds per month, i.e., the summation of the materials employed ("b" x "c");
 - e. the volume solids content of each coating added to the system;
 - f. the amount of solids, in gallons ("c" x "e" x transfer efficiency);
 - g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied ("d" / "f");
 - h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;
 - i. the total uncontrolled cure volatile VOC emissions, in pounds per month ("h" x "c");
 - j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results ("d" + "i" x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);
 - k. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids ("j" / "f");



- l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (i.e., the total liquid volume contained in the e-coat system's tanks, pumps, recirculation lines, filters, etc. at the system's designed liquid operating level), in gallons; and
- m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

**The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the cure volatile VOC emissions, in pounds per gallon, from the coatings (paste and resin e-coat blend). The cure volatiles for the coatings shall be calculated by subtracting the free solvent VOC content, as determined by formulation data or U.S. EPA Method 24, from the total VOC content, as determined by a Modified Method 24 adjusted for a higher curing oven temperature.

Cure Volatiles = Total VOC – Free Solvent.

- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating



The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in d)(3) above:
 - a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied (a) in the emissions units listed in d)(3) above, times each material's VOC content (b).

- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (see b)(2)c. above):
 - a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;
 - c. the number of gallons of materials from the recovery tank shipped off site;
 - d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, R003, and from the cleanup and purge materials applied in the emissions units listed in d)(3) represented in the applicable emission limitation (see b)(2)c. above), i.e., (c) x (d).

- (6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:
 - a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103 and R003;



- b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in d)(3), subject to the applicable Line 1/Line 2 facility VOC emission limitation in b)(2)c. above;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (see d)(5)e. above), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the applicable emission limitations in b)(2)c., recorded and calculated as per d)(5) above;
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units subject to the applicable VOC emission limitation (see b)(2)c. above), in pounds or tons per month, i.e., (a) + (b) - (c); and
 - e. the rolling, 12-month total VOC emissions from the Line 1 and Line 2 emissions units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.
- (7) The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the e-coat oven was processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the e-coat oven was processing units.
- (8) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
- (9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly exceedance/deviation reports that identify the following:
- a. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in b)(2)c. above;
 - b. all 3-hour blocks of time during which the average temperature within the thermal incinerator, when the e-coat oven was processing units, was more than 50



degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance (Compliance with this reporting requirement also satisfies compliance with 40 CFR 60.7(c).);

- c. any exceedance of the applicable free solvent VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)b. above; and
- d. any exceedance of the applicable total VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)b. above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

- (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of non-complying coatings, exceeding 1.12 lbs VOC/gal coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- (3) The permittee shall also submit annual reports that specify the total OC emissions 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.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

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:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in b)(2)d. above.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit subject to this emission limitation, and as specified in d)(6). Any recycle/recovery credit shall be recorded and calculated as per d)(5), and applied as per d)(6). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials. Monthly



emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in d)(2), and the purge and cleanup materials as specified in d)(3) and d)(4).

Air emissions from cleanup/purge material usage from emissions units listed in b)(2)d. and d)(3) shall be included in emissions estimations performed for demonstrating compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.

b. Emission Limitations:

When the solids turnover ratio (R_T)* is 0.160 or greater:

VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.

When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:

VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the monthly record keeping requirements, as specified in d)(2) above.

c. Emission Limitation:

1.12 lbs VOC/gallon of coating, as applied, excluding water and exempt solvents (free solvent)

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping as specified in d)(1) Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.



d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

- 8.14 lbs of particulate emissions/hr;
- 26.25 tons of particulate emissions/yr;
- 0.26lb of SO₂/hr;
- 1.16 tons of SO₂/yr;
- 46.93 lbs of NO_x/hr;
- 196.22 tons of NO_x/yr;
- 36.69 lbs of CO/hr;
- 160.71 tons of CO/yr;
- 2.50 lbs of VOC/hr; and
- 10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

e. Emission Limitation:

VOC emissions from the e-coat oven shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit.
- ii. Capture efficiency testing shall be conducted within 6 months after issuance of the permit. The most recent destruction efficiency testing was conducted on December 16, 2009. The most recent capture efficiency test was completed on September 23, 2010.
- iii. The following test methods shall be employed to demonstrate compliance with the VOC control efficiency requirements:



- (a) Method 1 of 40 CFR Part 60, Appendix A (for sample and velocity traverses);
- (b) Method 2 of 40 CFR Part 60, Appendix A (for velocity and volumetric flow rates);
- (c) Method 3 of 40 CFR Part 60, Appendix A (for molecular weight of dry gas stream);
- (d) Method 4 of 40 CFR Part 60, Appendix A (for moisture content of gas stream); and
- (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The capture efficiency of the e-coat oven controlling cure volatiles shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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.

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).

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.

A comprehensive written report on the results of the emission 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 IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

- (2) Formulation data or USEPA Method 24 shall be used to determine the “free” volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit.
- (3) A modified USEPA Method 24 shall be used to determine the “cure” volatile organic compound content of materials added to this emissions unit. The modified USEPA Method 24 shall be performed at process temperatures to appropriately identify “cure” volatile emissions generated in the curing process for the emissions unit.

g) Miscellaneous Requirements

- (1) None.



2. K206, PA Primer/Surfacer Line 1

Operations, Property and/or Equipment Description:

Line 1 primer/surfacer with gas-fired makeup air and oven

- 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)	Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO ₂ /hr; 1.16 tons of SO ₂ /yr; 46.93 lbs of NO _x /hr; 196.22 tons of NO _x /yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr. PE from coating overspray shall not exceed 2.60 lbs/hr and 5.19 tons/yr. See Section b)(2)d. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1), 3745-17-07(A)(1), and 3745-31-05(C).
b.	OAC rule 3745-31-05(D)	See Additional Terms and Conditions.
c.	OAC rule 3745-21-09(C)(1)(a)(v)	VOC emissions shall not exceed 2.8 lbs/gallon of coating minus water and exempt solvents or 15.1 lbs/gallon of



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		deposited solids, either as a daily volume-weighted average.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 Kg/liter of applied coating solids, as a monthly volume-weighted average.
g.	OAC rule 3745-21-08(B)	See Section b)(2)c. below.
h.	OAC rule 3745-18-06(E)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	40 CFR Part 60, Subpart IIII (40 CFR 63.3080-3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in the following section, Section b)(2)b., shall not exceed 1,176 tons VOC, combined, per rolling, 12-month period.
- b. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (online repair sanding, Line 1), P342 (Line 2 E-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)), Z355 (phosphating Line 2), and K240 (Line



1 LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in emissions estimations completed for demonstrating compliance with the emission limitation specified under Section b)(2)a.

- c. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- d. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8MMBtu/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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The permittee shall operate the downdraft/scrubber control system whenever spray coating is being applied in this emissions unit.
- (2) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_j = Destruction removal efficiency for emissions unit j (if applicable)



CE_i = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)

- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to demonstrate compliance with OAC rule 3745-21-09(C)(1)(a)(v), the permittee shall maintain records for the guide/primer coating line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (the Protocol). The Protocol shall be used to determine, calculate, measure, and/or document each of the following factors:

- a. the daily usage of each coating;
- b. the VOC generated per gallon of each coating;
- c. the volume solids content of each coating; and
- d. the daily weighted transfer efficiency of each coating applied.

The daily volume-weighted average for each day in a month may be calculated, recorded, and maintained at the end of each month as either:

- e. the daily volume-weighted average of VOC per gallon of deposited solids; or
- f. the daily volume-weighted average of VOC per gallon of coating minus water and exempt solvents.

- (2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable VOC emission limitation (Section b)(2)a.):

- a. the name and identification of each coating, reducing solvent, or other material employed;
- b. the VOC content of each coating, reducing solvent, or other material employed;
- c. the number of gallons of each coating, reducing solvent, or other material employed; and
- d. the total VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e., the summation of the products of



the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-Coat Line 1
K206-PA Primer/Surfacer Line 1
K208-Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Existing Line 1 and Line 2 Polish
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating
K240-Line 1 LASD

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3), above:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and



- d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied(a) in the emissions units listed in Section d)(3), above, times each material's VOC content (b).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)a.):
- a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;
 - c. the number of gallons of materials from the recovery tank shipped off site;
 - d. the OC/VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total OC/VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total OC/VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, R003, and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), represented in the applicable VOC emission limitation (Section b)(2)a.), i.e., (c) x (d).
- (6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103, and R003;
 - b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3), subject to the applicable VOC emission limitation in Section b)(2)a.;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the applicable VOC emission limitation in Section b)(2)a., recorded and calculated as per Section d)(5);
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units subject to the applicable emission limitation (Section b)(2)a.), in pounds or tons per month, i.e., (a) + (b) - (c); and



- e. the rolling, 12-month total VOC emissions from Line 1 and Line 2 emissions units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.
- (7) The permittee shall maintain records that document any time periods when the downdraft/scrubber control was not in service when spray coating was being applied in this emissions unit.
 - (8) A record of the calculations showing the monthly volume-weighted average mass of VOC per volume of applied coating solids (kilograms of VOC per liter) performed in accordance with 40 CFR Part 60, Subpart MM shall be maintained.
 - (9) In order to demonstrate compliance with the annual particulate emission limitation from over spray, the permittee shall maintain records for the guide/primer coating line of the following information:
 - a. the usage of each coating, in gallons;
 - b. the coating density of each coating, in pounds per gallon;
 - c. the solids content of each coating (weight percent);
 - d. the transfer efficiency of each coating applied;
 - e. the downdraft/scrubber system control efficiency; and
 - f. the calculated particulate emissions from over spray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).
 - (10) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346, by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
 - (11) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any monthly record indicating an exceedance of the 1.40 kg VOC/liter applied solids, as a monthly volume-weighted average (satisfies the reporting requirements of 40CFR Part 60.396(b) for NSPS emission limit deviations);
 - b. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)a.; and



- c. any record showing that the downdraft/scrubber control was not in service when coating was applied in this emissions unit.

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

- (2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any exceedance of the daily volume-weighted average of VOC per gallon of deposited solids and/or the daily volume-weighted average pounds of VOC/gallon of coatings, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- (3) The permittee shall also submit annual reports that specify the total organic compound and particulate emissions 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.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

f) Testing Requirements

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

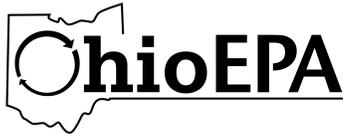
- a. Emissions Limitation:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in Section b)(2)b.

- Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(6). Any recycle/recovery credit shall be recorded and calculated as per Section d)(5), and applied as per Section d)(6). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials. Monthly emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in Section d)(2), and the purge and cleanup materials as specified in Section d)(3).

Air emissions from cleanup/purge material usage from emissions units in Section d)(3) shall be included in emissions estimations performed for demonstrating



compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.

b. Emission Limitations:

2.8 lbs of VOC/gallon of coating minus water and exempt solvents; or 15.1 lbs VOC/gallon of deposited solids, both as a daily volume-weighted average

Applicable Compliance Method:

Compliance with these VOC emission limitations for the prime/guide coat application shall be determined through the daily or monthly recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions. The VOC emission rate, pounds of VOC per gallon of coating solids deposited, and transfer efficiency shall be determined using the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018).

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lbs of particulate emissions/hr;
26.25 tons of particulate emissions/yr;
0.26 lb of SO₂/hr;
1.16 tons of SO₂/yr;
46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emission Limitation:



Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

e. Emission Limitation:

1.40 kg VOC/liter of solids applied as a monthly volume-weighted average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the monthly recordkeeping requirements, as specified in Section d)(8).

f. Emission Limitation:

2.60 pounds particulate emissions/hr from coating over spray

Applicable Compliance Method:

Compliance with this emission limitation shall be based on meeting the requirements for the downdraft/scrubber control system found in Sections c)(1), d)(7), and e)(1)c. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

g. Emission Limitation:

5.19 tons particulate emissions/yr from coating over spray

Applicable Compliance Method:

Compliance with the annual particulate emission limitation may be determined by the recordkeeping required in Section d)(9).

h. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

g) Miscellaneous Requirements



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

(1) None.



3. K208, PA L1 Body Topcoat

Operations, Property and/or Equipment Description:

Line 1 topcoat A, B, and on-line repair with gas-fired makeup air and ovens

- 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)	Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO ₂ /hr; 1.16 tons of SO ₂ /yr; 46.93 lbs of NO _x /hr; 196.22 tons of NO _x /yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr. PE from coating overspray shall not exceed 8.72 lbs/hr and 17.43 tons/yr. See Sections b)(2)d. and b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See Additional Terms and Conditions.
c.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 2.8 lbs/gallon of coating excluding water and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exempt solvents or 15.1 lbs/gallon of deposited solids, either as a daily volume-weighted average.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR 60, Subpart MM	VOC emissions shall not exceed 1.47 Kg/liter of applied coating solids, as a monthly volume-weighted average.
g.	OAC rule 3745-21-08(B)	See Section b)(2)c. below.
h.	40 CFR Part 63, Subpart IIII	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in the following section, Section b)(2)b., shall not exceed 1,176 tons VOC, combined, per rolling, 12-month period.
- b. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (online repair sanding, Line 1), P342 (Line 2 E-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)) Z355 (phosphating Line 2) and K240 (Line 1 LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in



emissions estimations completed for demonstrating compliance with the emission limitation specified under Section b(2)a.

- c. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- d. The total overall VOC control efficiency for this emissions unit shall be equal to or greater than 9 percent, by weight, where,

total overall VOC control efficiency = (destruction removal efficiency) x (oven capture).

- e. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8MMBtu/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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The topcoat oven of this emissions unit shall be vented to a thermal incinerator and the permittee shall assume a 10 percent oven VOC capture rate for the purpose of determining capture efficiency for add-on emissions control and in quantifying VOC emissions from this emissions unit, and to demonstrate compliance with permitted mass emission limitations from the topcoat operations. In order to demonstrate compliance with permitted emissions and to quantify VOC emissions for Line 1 topcoat and on-line repair operations (K208), VOC capture efficiency shall be determined for add-on emissions control based on the following data, collected in accordance with OAC rule 3745-21-09(C)(4), using the following equation:

$$\text{oven capture} = \frac{\text{daily bake oven exhaust control credit in lbs VOC/gal applied solids}}{\text{(uncontrolled daily VOC emissions rate in lbs VOC/gal applied solids)} \times 100\%}$$

as measured by the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-



018). A rate of 10 percent shall be used unless monitoring or emission testing provides a more accurate capture efficiency estimate.

The permittee shall assume a 90 percent incineration VOC control for the purpose of determining destruction efficiency for add-on emissions control and in quantifying VOC emissions from this emissions unit, to demonstrate compliance. This percent destruction efficiency shall be adjusted if monitoring or emission testing provides a more accurate estimate for topcoat emissions.

- (2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the topcoat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance, or less than 1200 degrees Fahrenheit.
- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature of thermal incinerator when the topcoat oven is processing units. 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 and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.
- (4) The permittee shall operate the downdraft/scrubber control system whenever spray coating is applied in this emissions unit.
- (5) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_i = Destruction removal efficiency for emissions unit j (if applicable)

CE_i = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)



- (6) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to demonstrate compliance with OAC rule 3745-21-09(C)(1)(a)(v), the permittee shall maintain records for the topcoat coating line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Truck Topcoat Operations" (the Protocol). The Protocol shall be used to determine, calculate, measure, and/or document each of the following factor:

- a. the daily usage of each coating;
- b. the VOC generated per gallon of each coating;
- c. the volume solids content of each coating;
- d. the daily weighted transfer efficiency of each coating applied; and
- e. the daily weighted bake oven exhaust control credit.

The daily volume-weighted average for each day in a month may be calculated, recorded, and maintained at the end of each month as either:

- a. the daily volume-weighted average of VOC per gallon of deposited solids; or
- b. the daily volume-weighted average of VOC per gallon of coating minus water and exempt solvents.

- (2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable Line 1/Line 2 facility VOC emissions limits (Section b)(2)a.):

- a. the name and identification of each coating, reducing solvent, or other material employed;
- b. the VOC content of each coating, reducing solvent, or other material employed;
- c. the number of gallons of each coating, reducing solvent, or other material employed;
- d. the total uncontrolled VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e., the summation of the products of



the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b); and

- e. the total controlled VOC emission rate from the topcoat operations for all coatings, reducing solvents, and other materials applied, calculated using the most recent capture and destruction efficiency test results for the oven and the incinerator, in pounds per month, i.e., $[(d) \times (100\% - \text{capture efficiency}^*) \times (100\% - \text{destruction efficiency})]$.

*this would include results of capture testing from the booth to oven, and from the oven to the incinerator.

- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitations:

K007-PA Final Repair
K011-PA ATF
K201-PA E-Coat Line 1
K206-PA Primer/Surfacer Line 1
K208- PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-Line 1 Phosphate Coating
Z355-Line 2 Phosphate Coating

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.



- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3) above:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied (a) in the emissions units listed in Section d)(3), above, times each material's VOC content (b).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)a.):
- a. The date the recovery tank was emptied;
 - b. The date the materials from the recovery tank were shipped off-site;
 - c. the number of gallons of materials from the recovery tank shipped off-site;
 - d. the VOC content of the materials from the recovery tank, in pounds per gallon acquired from the testing results of the recovered material; and
 - e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003, and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), represented in the applicable VOC emission limitation (Section b)(2)a.), i.e., (c) x (d).
- (6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103, R003;
 - b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3), subject to the applicable emission limitation in Section b)(2)a.;



- c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the emission limitation in Section b)(2)a., recorded and calculated as per Section d)(5);
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units subject to the applicable Line 1 and Line 2 emission limitation (Section b)(2)a.), in pounds or tons per month, i.e., (a) + (b) - (c); and
 - e. the rolling, 12-month total VOC emissions from Line 1 and Line 2 emissions units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.
- (7) The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the topcoat oven is processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance, or below 1200 degrees Fahrenheit; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the topcoat oven is processing units.
- (8) The permittee shall maintain records that document any time periods when the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.
- (9) A record of the calculations showing the monthly volume-weighted average mass of VOC per volume of applied coating solids (kilograms of VOC per liter) performed in accordance with 40 CFR Part 60, Subpart MM shall be maintained.
- (10) In order to demonstrate compliance with the annual particulate emission limitation from overspray, the permittee shall maintain records for the topcoat coating line of the following information:
- a. the usage of each coating, in gallons;
 - b. the coating density of each coating, in pounds per gallon;
 - c. the solids content of each coating (weight percent);
 - d. the transfer efficiency of each coating applied;
 - e. the downdraft/scrubber system control efficiency; and
 - f. the calculate particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).



- (11) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
- (12) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
 - a. any exceedance of the 1.47 kg VOC/liter applied solids, as a monthly volume-weighted average (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations);
 - b. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)a.;
 - c. all 3-hour blocks of time when the topcoat oven was processing units during which the average temperature within the thermal incinerator was below 1200 degrees Fahrenheit and more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance (Compliance with this reporting requirement also satisfies compliance with 40 CFR 60.7(c).); and
 - d. any record showing that the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.

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

- (2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any exceedance of the daily volume-weighted average of VOC per gallon of deposited solids and/or the daily volume-weighted average pounds of VOC per gallon of coatings, excluding water and exempt solvents emission limitations. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office, within 30 days following the end of the calendar month.
- (3) The permittee shall also submit annual reports that specify the total organic compound and particulate emissions 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.



- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

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:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in Section b)(2)b.

b. Applicable Compliance Method:

Compliance with these rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit subject to this emission limitation, and as specified in Section d)(6). Any recycle/recovery credit shall be recorded and calculated as per Section d)(5), and applied as per Section d)(6). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials. Monthly emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in Section d)(2), and the purge and cleanup materials as specified in Section d)(3).

Air emissions from cleanup/purge material usage from emissions units listed in Section d)(3) shall be included in emissions estimations performed for demonstrating compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.

c. Emission Limitation:

2.8 lbs VOC/gallon of coating minus water and exempt solvents, or
15.1 lbs VOC/gallon of deposited solids, as a daily volume-weighted average

Applicable Compliance Method:

Compliance with these VOC emission limitations for the topcoat application shall be determined through daily or monthly recordkeeping requirements, as specified in Section d)(1), and emission testing requirements as specified in f)(1)(i). Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials,



to be used in calculations of emissions. The VOC emission rate, pounds of VOC per gallon of coating solids deposited, and transfer efficiency shall be determined using the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018).

d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lbs of PE/hr;
26.25 tons of PE/yr;
0.26 lb of SO₂/hr;
1.16 tons of SO₂/yr;
46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

e. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

f. Emission Limitation:



1.47 kg VOC/liter of applied coating solids as a monthly volume-weighted average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the monthly recordkeeping requirements, as specified in Section d)(9).

g. Emission Limitation:

8.72 pounds PE/hr from coating over spray

Applicable Compliance Method:

Compliance with this emission limitation shall be based on meeting the requirements for the downdraft/scrubber control system found in Sections c)(4), d)(8), and e)(1). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

17.43 tons PE/yr from coating overspray

Applicable Compliance Method:

Compliance with the annual particulate emission limitation may be determined by the recordkeeping required in Section d)(10).

i. Emission Limitation:

The total overall VOC control efficiency for this emissions unit shall be equal to or greater than 9 percent, by weight.

Applicable Compliance Method:

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

- i. the emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.
- ii. the following test methods shall be employed to demonstrate compliance with the VOC control efficiency requirements:



- (a) Method 1 of 40 CFR Part 60, Appendix A (for sample and velocity traverses);
- (b) Method 2 of 40 CFR Part 60, Appendix A (for velocity and volumetric flow rates);
- (c) Method 3 of 40 CFR Part 60, Appendix A (for molecular weight of dry gas stream);
- (d) Method 4 of 40 CFR Part 60, Appendix A (for moisture content of gas stream); and
- (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

$$\text{Capture Efficiency} = [(\text{daily bake oven exhaust control credit in lbs VOC/gas}) / (\text{uncontrolled daily VOC emission rate in lb VOC/gas})] \times 100\%$$

- 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.

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).

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.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

A comprehensive written report on the results of the emission 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.

j. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group -Window Install Lines: K221, K222,

EU ID	Operations, Property and/or Equipment Description
K221	(K221) - (AF Line 1 Window Install and Off-line glass repair) Installation and repair of main glass and quarter glass using glass, primer, body primer, adhesives, misc. coatings and wiping solvents.
K222	(K222) - (AF Line 2 Window Install) Installation and repair of main glass and quarter glass using glass primer, body primer, adhesives, misc. coatings and wiping solvents.

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)	The requirements established pursuant to this rule include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor and to avoid PSD)	Organic compound/volatile organic compound (OC/VOC) emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed shall not exceed 18.1 tons per rolling, 12-month period. See Sections b)(2)a. and c)(1) below.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	The usage of body primer in this emissions unit shall not exceed 10 gallons per day.
d.	OAC rule 3745-21-09(U)(i)	When applying adhesives to metal, the VOC content of any adhesive employed in this emission unit shall not exceed 3.0 lbs/gallon, excluding water and exempt solvents.
e.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		CFR Parts 63.3091. Should Subpart IIII 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. All cleanup materials associated with this operation are accounted for by emissions unit P223 (assembly miscellaneous solvents) under PTI 01-6323.

c) Operational Restrictions

(1) The maximum material usage shall be limited by the following equation on a rolling 12-month basis:

$$18.1 \text{ tons} \geq \sum_{i=1}^n \frac{(U_i)(VOC_i)}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_i = volume of material i in gallons

VOC_i = VOC content of material i in lb/gal

(2) The emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

- a. the name and identification of each coating, glass and body primer, adhesive, and wiping solvent applied;
- b. the VOC content of each coating, glass and body primer, adhesive, and wiping solvent (excluding water and exempt solvents), when applied to metal;
- c. the OC/VOC content of each coating, glass and body primer, adhesive, and wiping solvent, when applied to non-metal; and
- d. the number of gallons of each coating, glass and body primer, adhesive, and wiping solvent employed.

(2) The permittee shall collect and record the following information each month:

- a. the total OC/VOC emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed, in pounds or tons; and



- b. the rolling, 12-month OC/VOC emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed, in tons.
- (3) The permittee shall collect and record the following information each day for body primer employed to metal components and/or parts:
- a. the name and identification of each coating employed;
 - b. the total volume of each coating employed; and
 - c. the total volume, in gallons, of all coatings employed.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing an exceedance of the 10 gallon per day coating usage restriction . The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
 - (2) The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the application of noncomplying adhesives (exceeding 3.0 lbs VOC/gal, as applied) to metal. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the rolling, 12-month OC/VOC emission limitation for emissions units K221 (Line 1 with off-line repair) and K222 (Line 2).
 - (4) The permittee shall also submit annual reports that specify the total OC/VOC emissions from emissions units K221 (Line 1 with off-line repair) and K222 (Line 2) 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.
 - (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in Section b)(1) shall be demonstrated in accordance with the following methods:



a. Emission Limitation:

The VOC content of any adhesive employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents, when coating metal.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(1).

b. Emission Limitation:

The usage of body primer in each emissions unit shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(3).

c. Emission Limitation:

Organic compound/volatile organic compound (OC/VOC) emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed in each emissions unit shall not exceed 18.1 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(2).

Formulation data from the manufacturer(s) of the coatings, glass and body primers, adhesives, and wiping solvents or analyses performed in accordance with 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the OC content of each material applied.

d. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -Wheel Well Blackout: K227, K228,

EU ID	Operations, Property and/or Equipment Description
K227	Line 1 wheel well blackout
K228	Line 2 wheel well blackout

- 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>The VOC content of the coatings employed in the wheel well, blackout application shall not exceed 0.62 pounds of VOC per gallon, as applied.</p> <p>Particulate emissions (PE) from coating/blackout overspray shall not exceed 1.6 tons/yr.</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(C).</p>
b.	OAC rule 3745-31-05 (D) (Synthetic Minor and to avoid PSD)	<p>VOC emissions shall not exceed 10.0 tons per rolling 12-month period from the Line 1 and Line 2 wheel well blackout operations, emission units K227 and K228 together.</p> <p>See production operational restriction Section c)(1) below.</p>
c.	OAC rule 3745-21-09(U)(1)(d)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from blackout coating overspray shall not exceed 0.551 lbs/hr.
f.	40 CFR Part 63, Subpart IIII	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum material usage in K227 and K228 combined shall be limited by the following equation on a rolling 12-month basis:

$$10.0 \text{ tons} \geq \sum_{i=1}^n \frac{(U_i)(VOC_i)}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_i = volume of material i , in gallons

VOC_i = VOC content of material i , in lb/gal

- (2) The permittee shall operate the fabric filter system whenever this emissions unit is in operation.
- (3) The cleanup material for the blackout operations is mostly water. Any miscellaneous cleanup or purge materials used for K227 and K228 shall be tracked, monitored, and reported as per the Paint Department's overall cleanup and purge material requirements.
- (4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information at the end of each month:
 - a. the name and identification of each coating employed in the wheel well blackout process; and
 - b. the VOC content of each coating, as applied.
- (2) The permittee shall collect and record the following information each month from wheel well blackout coatings applied in emissions units K227 and K228 together:
 - a. the name and identification of each blackout coating employed*;
 - b. the VOC content of each blackout coating, as applied, in pounds per gallon*;
 - c. the number of gallons of each blackout coating employed (gal/month); and
 - d. the total VOC emissions from all blackout process coatings employed in emission units K227 and K228 together, in pounds or tons per month, i.e., summation of the products of each coating's usage, times each coating's VOC content (b) x (c); and
 - e. the rolling 12-month VOC emissions from all blackout process coatings employed in K227 and K228 together.

* records are satisfied in Section d)(1).
- (3) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Central District Office in writing of any monthly record showing the use of noncomplying blackout coatings, exceeding 0.62pounds of VOC per gallon, as applied. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
- (2) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the dry filtration system was not in service when the emissions unit was in operation using a spray coating application. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.



- (3) The permittee shall submit annual reports for emission units K227 and K228 which specify total VOC emissions from these two emission units for the previous calendar year. These reports shall be submitted by April 15 of each year. The reporting requirements for these emission units may be satisfied by including them in the annual Fee Emission Report.
 - (4) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing an exceedance of the rolling, 12-month VOC emission limitation for K227 and K228.
 - (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- 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:
0.62 lb VOC/gallon for any wheel well blackout coating, as applied.

Applicable Compliance Method:
Compliance with this VOC limit shall be determined through monthly recordkeeping, as specified in Section d)(1), of each blackout coating applied and the volatile organic compound content of each. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.
 - b. Emission Limitation:
10.0 tons VOC per rolling, 12-month period for emission units K227 and K228 together.

Applicable Compliance Method:
Compliance with this limit shall be determined through the monthly recordkeeping, as specified in Section d)(2). Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the blackout coatings, to be used in the calculation of emissions.
 - c. Emission Limitation:
Visible particulate emissions 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).

d. Emission Limitation:

0.551 pounds particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system found in Sections c)(2), d)(3), and e)(2) of Part C. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

1.6 tons particulate emissions/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system specified under Sections c)(2), d)(3), and e)(2) of Part C and recordkeeping of the monthly usage of the coatings applied, and annual calculation of emissions.

g) Miscellaneous Requirements

(1) None.



6. K235, Line 2 E-Coat

Operations, Property and/or Equipment Description:

Line 2 E-coat

- 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>The VOC content of the coatings employed shall not exceed 0.75 lb/gallon, as applied, excluding water and exempt solvents (free solvent).</p> <p>See b)(2)b. below</p> <p>The total VOC emissions (free solvent + cure solvent) from K235 shall not exceed 96.1 tons/yr, excluding emissions from natural gas usage.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE (filterable)/hr; 0.26 lb SO₂/hr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(C)(1)(a), and 40 CFR Part 60 - Subpart MM.</p> <p>See b)(2)c. and b)(2)h. below.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	See b)(2)e., b)(2)f., c)(1), and c)(2) below.
c.	OAC rule 3745-21-09(C)(1)(a)	<p>VOC emissions shall not exceed 1.2 lbs/gallon, excluding water and exempt solvents, as applied.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
d.	NSPS - 40 CFR Part 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.
- b. This emissions unit shall not exceed the following:
 - i. When the solids turnover ratio (R_T)* is 0.160 or greater:
 - (a) VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.



- ii. When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:
 - (a) VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average.
- iii. When the solids turnover ratio (R_T)* is less than 0.040:
 - (a) No free solvent or total VOC emission limitation (lb/gallon of applied solids) is applicable.

* R_T is calculated in accordance with OAC rule 3745-21-09(C)(1)(a)(ii).

- c. The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.
- d. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(1)d. below.
- e. VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- f. The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 0.24 ton SO₂/yr, 3.02 tons PE/PM₁₀/yr, 39.73 tons NO_x/yr, and 33.38 tons CO/yr.
- g. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this PTI under emissions units K201, K206, K208, R003, R102, and R103.
- h. The hourly natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- i. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the PTI application. The installation of these sources will not require a permit modification provided that the new sources comply with the



emission limitations and operational restrictions for natural gas sources specified in b(2)f. and c)(2) above and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

c) Operational Restrictions

- (1) The maximum coating use from K235-K239 and P341, combined shall be shall be limited by the following equation on a rolling 12-month basis:

$$515.7 \text{ tons} \geq \sum_{j=1}^m \sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_{ij} = volume of coating i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating i (lb/gal) used in emissions unit j

DRE_j = Destruction efficiency for emissions unit j (if applicable)

CE_j = Capture efficiency for emissions unit j (if applicable)

- (2) The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.
- (3) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions tests that demonstrated the emissions unit was in compliance.
- (4) The permittee shall operate the RTO whenever the e-coat oven is processing units.
- (5) The permittee shall burn only natural gas as fuel in this emissions unit.
- (6) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the e-coat oven is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the e-coat oven was processing units, was more



- than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the e-coat oven was processing units
- (2) The permittee shall collect and maintain monthly records which contain the following information for materials added to the e-coat process for the purpose of determining compliance with VOC emission limitation, in lb/gallon:
- a. the name and identification of each coating and solvent added to the EDP system; and
 - b. the VOC content of each coating and solvent (excluding water and exempt solvents), as added to the EDP system, in lbs VOC/gal.
- (3) The permittee shall collect and maintain monthly records which contain the following information for materials added to the EDP system for the purpose of determining the contribution of coatings (resin and paste) and solvent employed in this emissions unit and to determine compliance with the rolling, 12-month VOC emission limitation and compliance with the pound of VOC/gas limitation specified in (b)(1) above):
- a. the name and identification of each coating and solvent employed;
 - b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;
 - c. the number of gallons of each coating and solvent employed, in gallons;
 - d. the total VOC emissions from all coatings and solvent employed, (i.e., the summation of the materials employed ("b" x "c");
 - e. the volume solids content of each coating added to the system;
 - f. the amount of solids, in gallons ("c" x "e" x transfer efficiency);
 - g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied ("d" / "f");
 - h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;
 - i. the total uncontrolled cure volatile VOC emissions, in pounds per month ("h" x "c");
 - j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results ("d" + "i" x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);
 - k. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids ("j" / "f");



- l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (i.e., the total liquid volume contained in the e-coat system's tanks, pumps, recirculation lines, filters, etc. at the system's designed liquid operating level), in gallons; and
- m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

**The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the cure volatile VOC emissions, in pounds per gallon, from the coatings (paste and resin e-coat blend). The cure volatiles for the coatings shall be calculated by subtracting the free solvent VOC content, as determined by formulation data or U.S. EPA Method 24, from the total VOC content, as determined by a Modified Method 24 adjusted for a higher curing oven temperature.

Cure Volatiles = Total VOC – Free Solvent.

- (4) The permittee shall maintain the following records, each calendar month, for Line 2 emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in f)(1)d. below for controlled units) + (summation of gallons of material x VOC content of material from uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emission units combined, in tons VOC per rolling, 12-month period.
- (5) The permittee shall maintain the following records, each calendar month, for Line 2 emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
 - a. the total combined natural gas usage rate for the Line 2 emission units, in cubic feet/month;
 - b. the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NO_x, SO₂, and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NO_x, SO₂ and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/rolling, 12-month period.



- (6) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in c)(3) above;
 - b. all records showing an exceedance of the 0.75 lb VOC/gallon, as applied, content limitation, excluding water and exempt solvents (free solvent).;
 - c. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons/rolling 12-month period;
 - d. all monthly records showing an exceedance of the total emissions from natural gas usage in Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, 0.24 ton SO2/yr, and 33.38 tons CO/yr;
 - e. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for Line 2 of 794,652,000 cubic feet;
 - f. all records showing that the RTO was not in service when the e-coat oven was processing units;
 - g. any exceedance of the applicable free solvent VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)b. above; and
 - h. any exceedance of the applicable total VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)b. above.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Standard Terms and Conditions of this permit.

- (2) The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (3) The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
- a. Emission Limitations:
- When the solids turnover ratio (R_T)* is 0.160 or greater:
- VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.
- When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:
- VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average.
- Applicable Compliance Method:
- Compliance with these emission limitations shall be determined through the monthly record keeping requirements, as specified in d)(3) above.
- b. Emission Limitation:
- 96.1 tons VOC/year from coating operations, excluding emissions from natural gas usage.
- Applicable Compliance Method:
- Compliance may be determined by the record keeping requirements specified in d)(3)j. above (i.e., summation of the monthly records for each year).
- c. Emission Limitations:
- Emissions from natural gas from emissions units K235-K238 combined:
- 0.82 lb PE (filterable)/hr;
0.26 lb SO₂/hr;
43.23 lbs NO_x/hr;
36.31 lbs CO/hr;
2.38 lbs VOC/hr



Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners 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.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Methods 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit.
- ii. Capture efficiency testing shall be conducted within 6 months after issuance of the permit. Destruction efficiency testing was conducted on September 17, 2009. Capture efficiency testing was completed on September 16, 2010.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and



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

The capture efficiency of the e-coat oven controlling cure volatiles shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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.

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).

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.

A comprehensive written report on the results of the emission 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.

e. Emission Limitations:

0.75 lb VOC/gallon of coating, as applied, excluding water and exempt solvents (free solvent)

Applicable Compliance Method:



Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping as specified in d)(2) Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

f. Emission Limitation:

515.7 tons VOC per rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in d)(4) above.

g. Emission Limitations:

The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

- 2.2 tons VOC/yr
- 3.02 ton PE/PM10/yr
- 39.73 ton NOx/yr
- 0.24 ton SO2/yr
- 33.38 ton CO/yr.

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage 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.

h. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

See 40 CFR Part 63, Subpart IIII(40 CFR 63.3080-3176).

- (2) Formulation data or USEPA Method 24 shall be used to determine the “free” volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit.
 - (3) A modified USEPA Method 24 shall be used to determine the “cure” volatile organic compound content of materials added to this emissions unit. The modified USEPA Method 24 shall be performed at process temperatures to appropriately identify “cure” volatile emissions generated in the curing process for the emissions unit.
- g) Miscellaneous Requirements
- (1) None.



7. K236, New Line 2 Primer/Surfacer

Operations, Property and/or Equipment Description:

Line 2 primer/surfacer including two primer/surface application areas and ovens

- 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>The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 9.5 lb/gallon of applied solids (gas), as a daily volume weighted average when employing solvent borne coatings and 5.5 lb/gas, as a daily volume weighted average when employing waterborne coatings.</p> <p>VOC emissions from K236 shall not exceed 225.10 tons/yr, excluding emissions from natural gas usage.</p> <p>Particulate emissions (PE) from coating overspray shall not exceed 2.40 lbs/hr. This emission limitation is equivalent to the requirements of OAC rule 3745-17-11(B)(1), based on Table I.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE (filterable)/hr; 0.26 lb SO₂/hr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-07(A)(1), 3745-21-09(C)(1)(c)(a)(v), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 60 - Subpart MM.</p> <p>See Sections b)(2)a., b)(2)b., b)(2)c., and b)(2)i. below.</p>
b.	OAC rule 3745-31-05(D)	<p>PE from emissions units K236, K237 and P342-P344 shall not exceed 9.82 tons per rolling, 12-month period, excluding emissions from natural gas usage.</p> <p>See Sections b)(2)f., b)(2)g., c)(1) and c)(2) below.</p>
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(C)(1)(a)(v)	<p>VOC emissions shall not exceed 15.1 lbs/gallon of deposited solids, as a daily volume weighted average.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>See Section b)(2)j. below.</p>
f.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40kg/liter of applied coating solids, as a monthly volume weighted average from the primer/surfacer coating operation.
g.	OAC rule 3745-21-08(B)	See Section b)(2)d. below.
h.	OAC rule 3745-23-06(B)	See Section b)(2)e. below.
i.	OAC rule 3745-31-28	See Section b)(2)k. below
j.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII 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. The primer/surfacer coating operation consists of two lines, each including a booth with auto and manual zones, oven and cooling area. The VOC emissions from the two ovens are controlled by a regenerative thermal oxidizer (RTO).
- b. The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.
- c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency (i.e. destruction removal efficiency of RTO x primer/surface oven capture efficiency) of 9 percent, by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)f. below.
- d. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- e. The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- f. VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- g. The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons



VOC/yr, 3.02 tons PE/PM10/yr, 0.24 ton SO2/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.

- h. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this PTI under emissions units K201, K206, K208, R003, R102, and R103.
- i. The hourly natural gas emission limitations and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- j. The primer/surfacer operation is regulated as a "surfacers" in accordance with the definition found in OAC rule 3745-21-01(C)(57). The definition states "surfacers means a surface coating applied to the body of an automobile or light-duty truck between the electrodeposition prime coat and the topcoat." The primer/surfacer is applied after the electrodeposition prime coat operation (K235) and before the topcoat operation (K237).
- k. This emissions unit is subject to the MACT Subpart IIII requirements specified in the Facility-Wide Terms and Conditions for this permit.
- l. Additional natural gas combustion sources (no individual burner greater than 10MMBTU/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the PTI application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations and operational restrictions for natural gas sources specified in Sections b)(2)g. and c)(2) of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

c) Operational Restrictions

- (1) The maximum coating use from K235-K239 and P341, combined shall be limited by the following equation on a rolling 12-month basis:

$$515.7 \text{ tons} \geq \sum_{j=1}^m \sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_{ij} = volume of coating i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating i (lb/gal) used in emissions unit j

DRE_j = Destruction efficiency for emissions unit j (if applicable)

CE_j = Capture efficiency for emissions unit j (if applicable)

- (2) The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.



- (3) The average combustion temperature within the RTO, for any 3-hour block of time when the ovens are processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit is in compliance.
 - (4) The permittee shall operate the underbooth scrubber whenever spray coating is being applied in this emissions unit.
 - (5) The permittee shall operate the RTO whenever the ovens are processing units.
 - (6) The permittee shall burn only natural gas as fuel in this emissions unit.
 - (7) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the ovens are processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the ovens were processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated ovens were processing units.
 - (2) The permittee shall maintain records that document any time periods when the underbooth scrubber was not in service when spray coating was being applied in this emissions unit.
 - (3) The permittee shall maintain records for the primer/surfacer operation that will enable the permittee to calculate the VOC emission rate, in lbs/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 9.5 lb/gas for all solventborne coatings applied, as a daily volume weighted average, 5.5 lb/gas for all waterborne coatings applied, as a daily volume weighted average and 1.40 kg/liter of applied coating solids, as a monthly weighted average.

The monitoring, record keeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission



Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof to determine daily volume weighted average or in accordance with NSPS 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the primer/surfacer operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

- (4) The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed;
 - d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section f)(1)f.
- (5) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section f)(1)d., e. and f. for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emission units combined, in tons VOC per rolling, 12-month period.
- (6) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions from coating overspray and sanding in the Line 2 emission units combined, in tons PE/month using the facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the Line 2 emission units combined, in tons PE per rolling, 12-month period.



- (7) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
 - a. the total combined natural gas usage rate for the Line 2 emission units, in cubic feet/month;
 - b. the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NOx, SO2, and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NOx, SO2 and CO emissions from natural gas usage in the Line 2 emission units combined, in tons per rolling, 12-month period.
 - (8) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
 - (9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in c)(3) above;
 - b. all records showing an exceedance of the controlled VOC emission rate of 9.5 lbs/gas, as a daily volume-weighted average for solventborne coatings applied and/or 5.5 lbs/gas, as a daily volume weighted average for waterborne coatings applied;
 - c. all records showing an exceedance of the controlled VOC emission rate of 1.40 kgs/liter of applied solid, as a monthly volume-weighted average (this reporting requirement also satisfies reporting required by 40 CFR 60.7 and 40 CFR 60 Subpart MM.);
 - d. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons per rolling 12-month period;
 - e. all monthly records showing a calculated PE emissions exceedance of the Line 2 emission limitation of 9.82 tons per rolling, 12-month period;
 - f. all monthly records showing an exceedance of the total emissions from natural gas usage in Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, 0.24 ton SO2/yr, and 33.38 tons CO/yr;



- g. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for Line 2 of 794,652,000 cubic feet;
- h. all records showing that underbooth scrubber was not in service when spray coating was applied in this emissions unit; and
- i. all records showing that the RTO was not in service when the oven is processing units.

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

- (2) The permittee shall submit annual reports by April 15th which specify the total VOC and PE emissions from this emissions unit. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (3) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

f) Testing Requirements

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

a. Emission Limitations:

The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 9.5 lb/gallon of applied solids (gas), as a daily volume weighted average when employing solventborne coatings and 5.5 lb/gas, as a daily volume weighted average when employing waterborne coatings.

1.40 Kg/liter of applied solids, as a monthly volume weighted average, from coating operations

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(3) above.

b. Emission Limitation:

225.1 tons VOC/year from coating operations, excluding emissions from natural gas usage.



Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

2.4 lbs PE/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the underbooth scrubber found in Sections c)(4), d)(2), and e)(1)i. above. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

0.82 lb PE (filterable)/hr;
0.26 lb SO₂/hr;
43.23 lbs NO_x/hr;
36.31 lbs CO/hr;
2.38 lb VOC/hr

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners 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.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Methods 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

9.82 tons PE per rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.



Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(6) above.

f. Emission Limitation:

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted 6 months after completion of construction and achievement of full production (end of transition period) of the Paint Line 2 not to exceed one year of startup of this emissions unit;
- ii. The emission testing shall be conducted to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central



District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

$$\text{Capture Efficiency} = \frac{\text{daily bake oven exhaust control credit in lbs VOC/gas}}{\text{(uncontrolled daily VOC emission rate in lb VOC/gas)}} \times 100\%$$

- iv. 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.

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).

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.

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.

- g. Emission Limitation:

515.7 tons VOC per rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section d)(6) above.



h. Emission Limitation:

The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 tons PE/PM10/yr
39.73 tons NOx/yr
0.24 ton SO₂/yr
33.38 tons CO/yr.

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage 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.

i. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

j. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



8. K237, New Line 2 Topcoat

Operations, Property and/or Equipment Description:

Line 2 topcoat including two basecoat and two clearcoat applications, spot primer and repair areas, and curing ovens

- 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>The controlled volatile organic compound(VOC) emission rate from this emissions unit shall not exceed 8.0 lb/gallon of applied solids (gas), as a daily volume weighted average.</p> <p>VOC emissions from K237 shall not exceed 196.3 tons/yr, excluding emissions from natural gas usage.</p> <p>Particulate emissions (PE) from coating overspray shall not exceed 2.40 lbs/hr. This emission limitation is equivalent to the requirements of OAC rule 3745-17-11(B)(1), based on Table I.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE (filterable)/hr; 0.26 lb SO₂/hr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p> <p>The requirements of this rule also include compliance with the requirements</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		of OAC rules 3745-31-05(D), 3745-17-07(A)(1), 3745-21-09(C)(1)(c), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 60 – Subpart MM. See Sections b)(2)a., b)(2)b., b)(2)c., and b)(2)j. below.
b.	OAC rule 3745-31-05(D)	PE from emissions units K236, K237 and P342-P344 shall not exceed 9.82 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Sections b)(2)f., b)(2)g., c)(1) and c)(2) below.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 15.1lbs/gallon of deposited solids, as a daily volume weighted average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.47kg/liter of applied coating solids, as a monthly volume weighted average from the topcoat operation.
g.	OAC rule 3745-21-08(B)	See Section b)(2)d. below.
h.	OAC rule 3745-23-06(B)	See Section b)(2)e. below.
i.	OAC rule 3745-31-28	See Section b)(2)j. below.
j.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Should Subpart IIII 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. The topcoat coating operation consists of two lines, each including a basecoat area with a heated flashoff and a clearcoat area followed by a topcoat curing oven. The VOC emissions from the two topcoat curing ovens and two clearcoat booth auto zones are controlled by a regenerative thermal oxidizer (RTO).
- b. The RTO controlling the topcoat curing ovens and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.
- c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency of 42 percent by weight (i.e.; sum of controlled T/C VOC emissions/sum of uncontrolled T/C VOC emissions), as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)f. below.
- d. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- e. The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- f. VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- g. The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 0.24 ton SO2/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.



- h. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this PTI under emissions units K201, K206, K208, R003, R102, and R103.
- i. The hourly natural gas emission limitations and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- j. Additional natural gas combustion sources (no individual burner greater than 10MMBTU/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the PTI application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations and operational restrictions for natural gas sources specified in Sections b)(2)g. and c)(2) of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

c) Operational Restrictions

- (1) The maximum coating use from K235-K239 and P341, combined shall be limited by the following equation on a rolling 12-month basis:

$$515.7 \text{ tons} \geq \sum_{j=1}^m \sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_{ij} = volume of coating i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating i (lb/gal) used in emissions unit j

DRE_j = Destruction efficiency for emissions unit j (if applicable)

CE_j = Capture efficiency for emissions unit j (if applicable)

- (2) The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.
- (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 is in compliance.
- (4) The permittee shall operate the underbooth scrubber and RTO whenever spray coating is being applied in this emissions unit.
- (5) The permittee shall burn only natural gas as fuel in this emissions unit.
- (6) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the 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 the emission unit is in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (2) The permittee shall maintain records that document any time periods when the underbooth scrubber was not in service when spray coating was being applied in this emissions unit.
 - (3) The permittee shall maintain records for the topcoat process that will enable the permittee to calculate the VOC emission rate, in lbs/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 8.0 lb/gas for all coatings, as a daily volume weighted average and 1.47 Kg/liter of applied coating solids, as a monthly weighted average.

The monitoring, record keeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof to determine daily volume weighted average or in accordance with NSPS 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

- (4) The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed;



- d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section f)(1)f.
- (5) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K239 and P341:
- a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section f)(1)d., e. and f. for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units);and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emission units combined, in tons VOC per rolling, 12-month period.
- (6) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K236, K237 and P342-P344:
- a. the total summation of controlled PE emissions from coating overspray and sanding in the Line 2 emission units combined, in tons PE/month using the facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the Line 2 emission units combined, in tons PE per rolling, 12-month period.
- (7) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
- a. the total combined natural gas usage rate for the Line 2 emission units, in cubic feet/month;
 - b. the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NOx, SO2, and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NOx, SO₂, and CO emissions from natural gas usage in the Line 2 emission units combined, in tons per rolling, 12-month period.



- (8) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in c)(3) above;
 - b. all records showing an exceedance of the controlled VOC emission rate of 8.0 lbs/gas, as a daily volume-weighted average;
 - c. all records showing an exceedance of the controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average (this reporting requirement also satisfies reporting required by 40 CFR 60.7 and 40 CFR 60 Subpart MM.);
 - d. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons per rolling 12-month period;
 - e. all monthly records showing a calculated PE emissions exceedance of the Line 2 emission limitation of 9.82 tons per rolling, 12-month period;
 - f. all monthly records showing an exceedance of the total emissions from natural gas usage in Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, 0.24 SO2/yr and 33.38 tons CO/yr;
 - g. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for Line 2 of 794,652,000 cubic feet; and
 - h. all records showing that the underbooth scrubber and/or RTO was not in service when spray coating was applied in this emissions unit.

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

- (2) The permittee shall submit annual reports by April 15th which specify the total VOC and PE emissions from this emissions unit. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (3) The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
- a. Emission Limitations:
- The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 8.0 lb/gallon of applied solids (gas), as a daily volume weighted average. 1.47 Kg/liter of applied solids, as a monthly volume weighted average, from coating operations
- Applicable Compliance Method:
- Compliance may be determined by the record keeping requirements specified in Section d)(3) above.
- b. Emission Limitation:
- 196.3 tons VOC/year from coating operations, excluding emissions from natural gas usage.
- Applicable Compliance Method:
- Compliance may be determined by the record keeping requirements specified in Section d)(4) above.
- c. Emission Limitation:
- 2.40 lbs PE/hr from coating overspray
- Applicable Compliance Method:
- Compliance with this limit shall be based on meeting the requirements for the underbooth scrubber control system found in Sections c)(4), d)(2), and e)(1)i. above. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
- d. Emission Limitations:
- Emissions from natural gas from emissions units K235-K238 combined:
- 0.82 lb PE (filterable)/hr;
0.26 lb SO₂/hr;
43.23 lbs NO_x/hr;



36.31 lbs CO/hr;
2.38 lbs VOC/hr

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners 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.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

9.82 tons PE per rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(6) above.

f. Emission Limitation:

The RTO controlling the topcoat curing ovens and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

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

- i. the emission testing shall be conducted within 6 months after completion of construction and achievement of full production (end of transition period) of the Paint Line 2 not to exceed one year of startup of this emissions unit;
- ii. the emission testing shall be conducted to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:



- (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

$$\text{Capture Efficiency} = \frac{\text{daily bake oven exhaust control credit in lbs VOC/gas}}{\text{(uncontrolled daily VOC emission rate in lb VOC/gas)}} \times 100\%$$

- iv. 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.

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).

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.



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.

g. Emission Limitation:

515.7 tons VOC/ rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section d)(5) above.

h. Emission Limitations:

The natural gas usage from emission units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 ton PE/PM10/yr
39.73 ton NOx/yr
0.24 ton SO2/yr
33.38 ton CO/yr.

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage 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.

i. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

j. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



9. K238, New Line 2 Sealer/Deadner/LASD

Operations, Property and/or Equipment Description:

Line 2 sealer/deadener operation including application of sealer, deadener, and liquid-applied sound deadener (LASD) and sealer oven

- 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>The volatile organic compound (VOC) content of the sealer/deadener employed in this emissions unit shall not exceed 0.30 lb/gallon.</p> <p>The VOC content of the liquid applied sound deadener (LASD) employed in this emissions unit shall not exceed 0.75 lb/gallon.</p> <p>VOC emissions from the sealer/deadener and LASD operations combined shall not exceed 57.31 tons/yr, excluding emissions from natural gas usage.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE (filterable)/hr; 0.26 lb SO₂/hr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p> <p>The requirements of this rule also include compliance with the requirements</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		of OAC rules 3745-31-05(D), 3745-21-09(U), 3745-21-08(B), and 3745-23-06(B). See Sections b)(2)a., b)(2)b., b)(2)c., and b)(2)i. below.
b.	OAC rule 3745-31-05(D)	See Sections b)(2)f. and b)(2)g. below.
c.	OAC rule 3745-21-09(U)	VOC emissions shall not exceed 3.0 lbs/gallon, excluding water and exempt solvent materials. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-08(B)	See Section b)(2)d. below.
e.	OAC rule 3745-23-06(B)	See Section b)(2)e. below.
f.	OAC rule 3745-31-28	See Section b)(2)k. below.
g.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII 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. The sealer/deadener coating operation consists of material application areas and sealer oven. The VOC emissions from the sealer oven are controlled by a regenerative thermal oxidizer (RTO).
- b. The RTO controlling the sealer oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.
- c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency (i.e., destruction removal efficiency of RTO x sealer oven capture efficiency) of 71% by weight for sealer & deadener and 90% by weight for LASD, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)d. below.



- d. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- e. The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- f. VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- g. The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 0.24 ton/yr SO₂, 39.73 tons NO_x/yr, and 33.38 tons CO/yr.
- h. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this PTI under emissions units K201, K206, K208, R003, R102, and R103.
- i. The hourly natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- j. The 0.30 lb VOC/gallon emission limitation for sealer/deadener and the 0.75 lb VOC/gallon for LASD materials specified under OAC rule 3745-31-05(A)(3) is based upon the use of compliant coatings as denoted in OAC rule 3745-21-09(B)(3)(f).
- k. Additional natural gas combustion sources (no individual burner greater than 10MMBTU/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the PTI application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations and operational restrictions for natural gas sources specified in Sections b)(2)g. and c)(2) of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.



c) Operational Restrictions

- (1) The maximum coating use from K235-K239 and P341 combined shall be limited by the following equation on a rolling 12-month basis:

$$515.7 \text{ tons} \geq \sum_{j=1}^m \sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}}$$

U_{ij} = volume of coating i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating i (lb/gal) used in emissions unit j

DRE_j = Destruction efficiency for emissions unit j (if applicable)

CE_j = Capture efficiency for emissions unit j (if applicable)

- (2) The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.
- (3) The average combustion temperature within the RTO, for any 3-hour block of time when the oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit is in compliance.
- (4) The permittee shall operate the RTO whenever the oven is processing units.
- (5) The permittee shall burn only natural gas as fuel in this emissions unit.
- (6) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the oven is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the oven is processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and



- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the oven is processing units.
- (2) The permittee shall collect and record the following information each month for the sealer/deadener and LASD applications:
 - a. the name and identification of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon.
- (3) The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in lbs/gallon;
 - d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section f)(1)d.
- (4) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section f)(1)d., e. and f. for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emission units combined, in tons VOC/rolling, 12-month period.
- (5) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
 - a. the total combined natural gas usage rate for the Line 2 emission units, in cubic feet/month;
 - b. the total natural gas usage rate, in cubic feet per rolling 12-month period.
 - c. the total summation of VOC, PE/PM10, NOx, SO2, and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/month; and



- d. the total rolling, 12-month summation of VOC, PE/PM10, NOx, SO2 and CO emissions from natural gas usage in the Line 2 emission units combined, in tons/rolling, 12- month period.
 - (6) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
 - (7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in c)(3) above;
 - b. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons per rolling 12-month period;
 - c. all monthly records showing an exceedance of the total emissions from natural gas usage in Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, 0.24 ton SO2/yr and 33.38 tons CO/yr;
 - d. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for Line 2 of 794,652,000 cubic feet and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage; and
 - e. all records showing that the RTO was not in service when the oven is processing units.

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

- (2) The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (3) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the VOC emission rates of 0.30 lb/gal for sealer/deadener materials or 0.75 lb/gal for LASD materials or 3.0



lbs/gallon, excluding water and exempt solvents materials . Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.

- (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

f) Testing Requirements

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

- a. Emission Limitations:

0.30 lb VOC/gal for sealer/deadener materials and 0.75 lb VOC/gal for LASD materials 3.0 lbs/gallon, excluding water and exempt solvent materials.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(2) above.

- b. Emission Limitation:

57.31 tons VOC/yr from the sealer/deadener and LASD, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(3) above.

- c. Emission Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

- 0.82 lb PE (filterable)/hr;
- 0.26 lb SO₂/hr;
- 43.23 lbs NO_x/hr;
- 36.31 lbs CO/hr;
- 2.38 lb VOC/hr.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners 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.



If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted 6 months after completion of construction and achievement of full production (end of transition period) of the Paint Line 2 not to exceed one year of startup of this emissions unit;
- ii. The emission testing shall be conducted to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
- iv. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
- v. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- vi. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- vii. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- viii. Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office



will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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.

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).

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.

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.

e. Emission Limitation:

515.7 tons VOC per rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section d)(4) above.

f. Emission Limitation:

The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

- 2.2 tons VOC/yr
- 3.02 ton PE/PM10/yr
- 39.73 ton NOx/yr
- 0.24 ton SO₂/yr
- 33.38 ton CO/yr.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage 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.

g. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



10. K240, LASD Line 1

Operations, Property and/or Equipment Description:

Line 1 Liquid Applied Sound Deadening Operation

- 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)	The volatile organic compound (VOC) content of the liquid applied sound deadening (LASD) employed in this emissions unit shall not exceed 0.18 lb/gallon. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D).
b.	OAC rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid PSD)	See Section c)(1) and c)(2) below.
d.	OAC rule 3745-31-28	See Section b)(2)b. below.
e.	40 CFR Part 63, Subpart IIII (63.3091-3164)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII 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. Emissions unit K240 consists of robotic material applicators, associated material storage and transfer equipment and shares the primer-surfacer/LASD oven with K206. The primer-surfacer/LASD oven (K206) is currently permitted under PTI 01-6743, issued on 03/09/06.

c) Operational Restrictions

- (1) The emissions of VOC from this emissions unit shall not exceed 34.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- (2) The maximum 12-month rolling material usage rate in K240 of each type of coating used shall be such that the combined VOC emissions do not exceed 34.0 tons per rolling 12-month period as represented by the following equation:

$$\sum_{i=1}^n \frac{(U_i)(VOC_i)}{2000 \frac{\text{lb}}{\text{ton}}} \leq 34.0 \text{ tons per rolling 12-month period}$$

Where :

U_i = volume of material i in gallons

VOC_i = VOC content of material i in lb/gal

- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) 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 of each coating, as applied;
 - b. the VOC content of each coating as applied, in lbs/gallon;
 - c. the number of gallons of each coating employed;
 - d. the total VOC emissions from all coating materials employed, in pounds or tons, i.e., the summation of the products of the amounts (c) of all coatings applied in this emissions unit times each material's VOC content (b);and
 - e. the rolling, 12-month total VOC emissions, i.e., (d) + the calculated total VOC emissions for the previous 11 months.
- (2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.



- (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing a calculated VOC emissions exceedance of the LASD emission limitation of 34.0 tons per rolling, 12-month period.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Section A of the General Term and Conditions.

- (2) The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (3) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the VOC emission rates of 0.18 lb/gal. Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.18 lb VOC/gal

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirements specified in Section d)(1) above.

b. Emission Limitation:

34.0 tons VOC/ rolling, 12-month period.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined by the record keeping specified in Section d)(1) above.

c. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.
- (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

- (1) None.



11. Emissions Unit Group -Main Body Welding Lines: P004, P330,

EU ID	Operations, Property and/or Equipment Description
P004	Weld Line 2: robotic & manual MIG & resistance welding, solder, brazing, sealer application, and miscellaneous organic use in welding
P330	Weld Line 1: robotic & manual MIG & resistance welding, solder, brazing, sealer application, and miscellaneous organic use in welding

- 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) Section d)(5).
- 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(D) (Synthetic Minor and to avoid PSD)	Organic compound emissions shall not exceed 11.0 tons per rolling 12 months for welding operations on Line 1 (P330) and Line 2 (P004).
b.	OAC rule 3745-31-05(A)(3)	MIG welding and brazing: Fugitive particulate emissions shall not exceed 0.26 lb/hr and 0.52 ton/yr from Weld Line 1 & Line 2 together Anti-spatter materials and cleaning solutions shall not exceed 4.3 lbs OC/gal. See Sections b)(2)c and c)(1)
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	Miscellaneous sealers/sealants and quality marker coating usage: Use of no more than 10 gallons/day of miscellaneous *sealers/sealants and quality marker coatings
d.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

*These sealers and sealants are not the same materials, nor the same application, as those permitted for use in emission units P005 and P200.

(2) Additional Terms and Conditions

a. The annual usage of MIG and brazing wire and rod shall not exceed 443,000 pounds per year on Line 1 and Line 2 together.

c) Operational Restrictions

(1) The permittee shall minimize or eliminate visible particulate emissions through the installation and operation of collection hoods and fans at the point of emissions from the primary MIG welding. This collection system shall be vented to a baghouse having a collection efficiency of 90%, whenever MIG welding occurs in the primary MIG area. Capture efficiency at the point source of emissions shall be calculated at 85%, unless testing of the hood collection system demonstrates a different efficiency. Manual repair, mobile MIG welding, and the individual MIG robots on D Zone operations shall not require control.

(2) The maximum material usage and spot welding shall be limited by the following equation on a rolling 12-month basis:

$$11.0 \text{ tons} \geq \sum_{i=1}^n \frac{(U_i)(VOC_i)}{2000 \frac{\text{lb}}{\text{ton}}} + (PPU)(PR)$$

U_i = volume of material i in gallons

VOC_i = VOC content of material i in lb./gal

PPU = pounds VOC per unit from spot welding (see Section f(1))

PR = number of units built measured at AF - Off

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the welding operations:

a. the name and identification for each anti-spatter and cleaning solution employed; and

b. the organic compound content of each anti-spatter and cleaning solution, as applied.



- (2) The permittee shall collect and record the following information each day for the welding operations:
- a. the name and identification for each miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material employed to the auto body or metal part;
 - b. the volume, in gallons, of each miscellaneous sealer/sealant and quality marker coating employed; and
 - c. the total volume, in gallons, of all miscellaneous sealers/sealants and quality marker coatings employed.

If the total use of these materials, in any single day, is less than 1 gallon per day, the material used need only be recorded in the daily record as <1 gallon. Monthly emissions shall be calculated using actual monthly usage inventory records, if monthly records prove more accurate than the sum of daily usage.

- (3) The permittee shall collect and record the following information each month for the welding operations:
- a. the number of gallons of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, miscellaneous organic material employed, and pounds (or tons) of MIG and brazing wire/rod consumed;
 - b. the organic compound content of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material, in pounds per gallon;
 - c. the total organic compound emissions from all cleaning solutions, anti-spatter materials, miscellaneous sealers/sealants, quality marker coatings, miscellaneous organic material usage, and the vaporization of rust preventive oils from spot welding, in pounds per month;
 - d. the rolling 12-month production of automobiles, measured at the "AF Off" area; and
 - e. the rolling 12-month OC emissions from welding operations on Line 1 and Line 2.
- (4) The permittee shall maintain records that document any time periods when the hood collection or fabric filter systems were not in service when MIG welding occurs in the primary MIG welding area.
- (5) The permit to install for this emissions unit 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 ("OAC rule 3745-114") 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” usage for this pollutant:

Pollutant: dipropylene glycol monomethyl ether

TLV: 606 mg/m³

Maximum Hourly Emission Rate: 6.43 lbs/hr from both welding Lines 1 and 2

Predicted 1-Hour Maximum Ground-Level Concentration: 1.401 mg/m³

MAGLC: 14.43 mg/m³

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):



- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which include the following:
 - a. any monthly record or calculation showing an exceedance of the 12-month rolling OC emissions limit of 11.0 tons for Line 1 and Line 2 welding operations;
 - b. any record showing an exceedance of the annual MIG brazing wire/rod usage of 443,000 pounds per year on welding Lines 1 and 2.
 - c. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9), for antispatter material and cleaning solution usage including an identification of the material used, its composition, and the day(s) and duration of time the material was used.
- (2) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing the use of noncomplying (>4.3 lbs OC/gal) anti-spatter materials or cleaning solutions. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.
- (3) The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the welding line employed more than 10 gallons per day of miscellaneous sealers/sealant(s) and quality marker coating(s) (together). The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.



- (4) The permittee shall notify the Ohio EPA Central District Office of any daily record showing that the hood collection system/fan and/or fabric filter were not in service when MIG welding occurs in the primary MIG welding area .
 - (5) 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.
- 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:
11.0 tons OC/rolling, 12-month period for Line 1 and Line 2 welding operations
Applicable Compliance Method:
Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of units produced, material usage, the organic compound content of each material used, calculation of the volatile emissions from rust protecting oils from the point of weld (calculated, as shown below), and the rolling 12-month summation of calculated OC emissions (See Section d)(3)). Formulation data from the material's manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the cleaning solutions, anti-spatter materials, sealers/sealants, quality marker coatings, and/or miscellaneous organic materials to be used in the calculation of emissions. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations, from the emissions unit, to the previous 11 month's emission calculations.

Organic compound emissions from the rust protectant oils at the point of weld, shall be calculated as follows:

Annual Emissions = Area of weld (πR^2) or $(3.1416)(0.0328 \text{ ft}^2) \times$ amount of rust protective oil on metal sheet $(275 \text{ mg/ft}^2) \times (0.0022 \text{ lb/1000 mg}) \times (3,000 \text{ welds/car}) \times (\text{total number of units}) \times (4 \text{ sides/weld}) \times (1 \text{ ton/2000 lbs})$
 - b. Emission Limitations:
0.26 lb particulate emissions/hr from both Lines 1 and 2
0.52 ton particulate emissions/yr from both Lines 1 and 2
Applicable Compliance Method:
Compliance with the particulate limits contained in this permit shall be determined through annual calculation of worst case emissions. To document the worst case emission rate for particulate matter, the following equations shall be used:



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Hourly Emissions = [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] = 0.26 lbs particulate emissions/hour.

Annual Emissions = [actual or maximum MIG and brazing wire/rod usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [actual or maximum MIG wire usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] x [1 ton/2000 lbs] = 0.52 tons particulate emissions/yr.

- g) Miscellaneous Requirements
 - (1) None.



12. P201, PA Line 1 E-coat Sanding

Operations, Property and/or Equipment Description:

Line 1 E-coat sanding

- 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>Particulate emissions (PE) from the sanding operations shall not exceed 0.34 lb/hr.</p> <p>Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed:</p> <p>8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO₂/hr; 1.16 tons of SO₂/yr; 46.93 lbs of NO_x/hr; 196.22 tons of NO_x/yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr.</p> <p>See Section b)(2)c. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	PE from emissions units P201, P205, and P346, shall not exceed 3.54 tons per rolling, 12-month period, excluding emissions from natural gas usage.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling the emissions unit
- b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.
- c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The maximum number of sanded units for emissions units P201, P205, and P346 shall be limited by the following equation on rolling 12-month basis:



$$3.54 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1 - RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1 - RE_j)}{2000 \frac{\text{lb}}{\text{ton}}}$$

- P = number of units sanded, measured at PA - Off
- VS_i = average volume of sanding particles per unit
- D_i = density of sanding particles
- RE_i = removal efficiency of particle filtration system
- RP = number of repair units sanded in P346
- VS_j = average volume of sanding particles per unit
- D_j = density of sanding particles
- RE_j = removal efficiency of P346 particle filtration system

(2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

units = recorded for Line 1 per Section d)(3)

(2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.

- (3) The permittee shall maintain monthly records for emissions units P201, P205, and P346
- a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area; and
 - b. the total Line 1 rolling, 12-month production rate, in units (cars), measured at the "PA Off" area.

- (4) The permittee shall maintain the following records each calendar month:
- a. the total summation of controlled PE emissions, in tons PE per month; and
 - b. the total rolling, 12-month summation of controlled PE emissions, in tons PE per rolling, 12-month period.

(5) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas



usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the emission limitation of 3.54 tons/rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

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

- (2) The permittee shall submit annual reports by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.34 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

$(\text{volume of sanding, cu. ft/unit}) \times (\text{density of particulate, lb/cu. ft}) \times (\text{maximum quantity of units sanded per hour}) \times (1 - \text{control efficiency of fabric filter control})$

where,

volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04

maximum quantity of units sanded = 73 per hour

control efficiency of fabric filter = 90% (assumes 100% capture).



b. Emission Limitation:

3.54 tons PE per rolling, 12-month period from emissions units P201, P205, and P346 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(5) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

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

d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lbs of PE/hr;
26.25 tons of PE/yr;
0.26 lb of SO₂/hr;
1.16 tons of SO₂/yr;
46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.



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Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
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g) Miscellaneous Requirements

(1) None.



13. P205, PA Line 1 primer/surfacer sanding

Operations, Property and/or Equipment Description:

Line 1 primer/surfacer sanding

- 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)	Particulate emissions (PE) from the sanding operations shall not exceed 0.48 lb/hr. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO ₂ /hr; 1.16 tons of SO ₂ /yr; 46.93 lbs of NO _x /hr; 196.22 tons of NO _x /yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr. See Section b)(2)c. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	PE from emissions units P201, P205, and P346, shall not exceed 3.54 tons per rolling, 12-month period, excluding emissions from natural gas usage.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling the emissions unit
- b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.
- c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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 A.I.1. of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The maximum number of sanded units for emissions units P201, P205, and P346 shall be limited by the following formula, calculated as a rolling 12-month period:

$$3.54 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1-RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1-RE_j)}{2000 \frac{\text{lb}}{\text{ton}}}$$

P = number of units sanded, measured at PA-Off

VS_i = average volume of sanding particles per unit

D_i = density of sanding particles



RE_i = removal efficiency of particulate filtration system

RP = number of repair units sanded in P346

VS_j = average volume of sanding particles per unit

D_j = density of sanding particles

RE_j = removal efficiency of P346 particulate filtration system

- (2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

units = recorded for Line 1 per Section d)(3)

- (2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
- (3) The permittee shall maintain monthly records for emissions units P201, P205, and P346.
- a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area; and
- b. the total Line 1 rolling, 12-month production rate, in units (cars), measured at the "PA Off" area.
- (4) The permittee shall maintain records the following records each calendar month:
- a. the total summation of controlled PE emissions, in tons PE/month; and
- b. the total rolling, 12-month summation of controlled PE emissions, in tons PE per rolling, 12-month period.
- (5) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the emission limitation of 3.54 tons per rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

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

- (2) The permittee shall submit annual reports by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.48 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

$(\text{volume of sanding, cu. ft/unit}) \times (\text{density of particulate, lb/cu. ft}) \times (\text{maximum quantity of units sanded per hour}) \times (1 - \text{control efficiency of fabric filter control})$

where,

volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04

maximum quantity of units sanded = 73 per hour

control efficiency of fabric filter = 90% (assumes 100% capture).

b. Emission Limitation:

3.54 tons PE per rolling, 12-month period from emissions units P201, P205, and P346 combined.



Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

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

d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

- 8.14 lbs of PE/hr;
- 26.25 tons of PE/yr;
- 0.26 lb of SO₂/hr;
- 1.16 tons of SO₂/yr;
- 46.93 lbs of NO_x/hr;
- 196.22 tons of NO_x/yr;
- 36.69 lbs of CO/hr;
- 160.71 tons of CO/yr;
- 2.50 lbs of VOC/hr; and
- 10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

g) Miscellaneous Requirements

- (1) None.



14. P341, New Line 2 Sludge Pit

Operations, Property and/or Equipment Description:

Line 2 sludge pit

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) d)(3).

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)	Volatile organic compound (VOC) emissions from the water treatment materials added to the sludge pits shall not exceed 1.44 lbs/gallon, including water and exempt solvents, as a monthly volume weighted average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	VOC emissions from the sludge pit operations shall not exceed 10.57 tons per rolling, 12-month period. See Sections b)(2)c. and c)(1) below.

(2) Additional Terms and Conditions

a. The Line 2 sludge pit operations consist of addition of water treatment materials that contain VOC to the sludge pits associated with coating activities in New Line 2. VOC emissions from the sludge pit operations are not controlled.

b. VOC emissions from vehicle production for Line 2 emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.



c) Operational Restrictions

- (1) The maximum water treatment material usage for this emissions unit shall not cause emissions to exceed 10.57 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$10.57 \text{ tons VOC} \geq \frac{\sum (P_i) \times (OC_i)}{2000}$$

where,

P_i = usage of water treatment materials, i , in gallons

OC_i = OC content of water treatment materials, i , in pounds per gallon (assumes 100% of organic solvent is emitted).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for this emissions unit:
- a. the name and identification of each water treatment material employed in the sludge pits;
 - b. the VOC content of each water treatment material employed in the sludge pits, in pounds per gallon;
 - c. the total number of gallons of each water treatment material employed;
 - d. the calculated total VOC emissions from all water treatment material employed, in pounds per month; and
 - e. the rolling, 12-month VOC emissions from all water treatment material employed, in pounds or tons.
- (2) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K239 and P341:
- a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section f)(1)d., e. and f. for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emission units combined, in tons VOC per rolling, 12-month period.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual



emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all records showing an exceedance of the VOC emission rate of 1.44 lbs/gal, including water and exempt solvents, as a monthly volume weighted average;
 - b. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons per rolling, 12-month period; and
 - c. all monthly records showing a calculated VOC emissions exceedance of the P341 emission limitation of 10.57 tons per rolling, 12-month period; and

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

- (2) The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

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:

1.44 lb VOC/gal, including water and exempt solvents

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above.

b. Emission Limitation:

10.57 tons VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

c. Emission Limitation:

515.7 tons VOC per rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

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

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the VOC containing materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



15. P342, New Line 2 E-coat Sanding

Operations, Property and/or Equipment Description:

Line 2 E-coat sanding operations

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)	Particulate emissions (PE) from the sanding operations shall not exceed 0.02 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.82 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.



b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) The maximum number of sanded units for emissions units P342, P343, and P344 shall be limited by the following equation on a rolling 12-month basis:

$$9.82 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1-RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1-RE_j)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{k=1}^p \frac{(G_k)(S_k)(D_k)(1-TE_k)(1-RE_k)}{2000 \frac{\text{lb}}{\text{ton}}}$$

P = number of units sanded measured at PA - Off

VS_i = average volume of sanding particles per unit in P342 and P343

D_i = density of sanding particles in P342 and P343

RE_i = removal efficiency of particle filtration system in P342 and P343

RP = number of repair units sanded in P344

VS_j = average volume of sanding particles per unit in P344

D_j = density of sanding particles in P344

RE_j = removal efficiency of P344 particle filtration system

G_k = volume of coating in K236 and K237 (gallons)

S_k = weight percent solids of coating k in K236 and K237 (%)

D_k = density of coating in K236 and K237 (lb/gal)

TE_k = transfer efficiency of coating k in K236 and K237 (%)

RE_k = removal efficiency of coating k in K236 and K237 (%)

(2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded per d)(3); and

average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.



- (2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
 - (3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off"; and
 - b. the total rolling, 12-month production rate, in units (vehicles), measured at "Paint Off."
 - (4) The permittee shall maintain records each calendar month, for the Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions in the Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the Line 2 emission units combined, in tons PE per rolling, 12-month period.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the Line 2 emission limitation of 9.82 tons per rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.
- These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE from the sanding operations shall not exceed 0.02 lbs/hr



Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (control efficiency of fabric filter control) where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

maximum quantity of units sanded = 80 per hour

control efficiency of fabric filter = 98% (assumes 100% capture).

b. Emission Limitation:

9.82 tons PE per rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



16. P343, New Line 2 Surfacers Sanding

Operations, Property and/or Equipment Description:

Line 2 surfacer sanding operations

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)	Particulate emissions (PE) from the sanding operations shall not exceed 0.05 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.82 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.



- b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

c) **Operational Restrictions**

- (1) The maximum number of sanded units for emissions units P342, P343, and P344 shall be limited by the following equation on a rolling 12-month basis:

$$9.82 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1-RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1-RE_j)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{k=1}^p \frac{(G_k)(S_k)(D_k)(1-TE_k)(1-RE_k)}{2000 \frac{\text{lb}}{\text{ton}}}$$

P = number of units sanded measured at PA - Off

VS_i = average volume of sanding particles per unit in P342 and P343

D_i = density of sanding particles in P342 and P343

RE_i = removal efficiency of particle filtration system in P342 and P343

RP = number of repair units sanded in P344

VS_j = average volume of sanding particles per unit in P344

D_j = density of sanding particles in P344

RE_j = removal efficiency of P344 particle filtration system

G_k = volume of coating in K236 and K237 (gallons)

S_k = weight percent solids of coating k in K236 and K237 (%)

D_k = density of coating in K236 and K237 (lb/gal)

TE_k = transfer efficiency of coating k in K236 and K237 (%)

RE_k = removal efficiency of coating k in K236 and K237 (%)

- (2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded per d)(3); and

average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.



- (2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
 - (3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off"; and
 - b. the total rolling, 12-month production rate, in units (vehicles), measured at "Paint Off".
 - (4) The permittee shall maintain the following records, each calendar month, for Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions in the Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the Line 2 emission units combined, in tons PE per rolling, 12-month period.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the Line 2 emission limitation of 9.82 tons/rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE from the sanding operations shall not exceed 0.05 lbs/hr



Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (1-control efficiency of fabric filter control) where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003
maximum quantity of units sanded = 80 per hour
control efficiency of fabric filter = 98% (assumes 100% capture).

b. Emission Limitation:

9.82 tons PE per rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



17. P344, Line 2 Repair Sanding

Operations, Property and/or Equipment Description:

Line 2 repair sanding operations

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)	Particulate emissions (PE) from the sanding operations shall not exceed 0.12 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.82 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.



- b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

c) **Operational Restrictions**

- (1) The maximum number of sanded units for emissions units P342, P343, and P344 shall be limited by the following equation on a rolling 12-month basis:

$$9.82 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1-RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1-RE_j)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{k=1}^p \frac{(G_k)(S_k)(D_k)(1-TE_k)(1-RE_k)}{2000 \frac{\text{lb}}{\text{ton}}}$$

P = number of units sanded measured at PA - Off

VS_i = average volume of sanding particles per unit in P342 and P343

D_i = density of sanding particles in P342 and P343

RE_i = removal efficiency of particle filtration system in P342 and P343

RP = number of repair units sanded in P344

VS_j = average volume of sanding particles per unit in P344

D_j = density of sanding particles in P344

RE_j = removal efficiency of P344 particle filtration system

G_k = volume of coating in K236 and K237 (gallons)

S_k = weight percent solids of coating k in K236 and K237 (%)

D_k = density of coating in K236 and K237 (lb/gal)

TE_k = transfer efficiency of coating k in K236 and K237 (%)

RE_k = removal efficiency of coating k in K236 and K237 (%)

- (2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units processed through the repair line) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded for Line 2 on-line repair; and

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003



- (2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
 - (3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off"; and
 - b. the total rolling, 12-month production rate, in units (vehicles), measured at "Paint Off."
 - (4) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions in the Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the Line 2 emission units combined, in tons PE per rolling, 12-month period.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the Line 2 emission limitation of 9.82 tons per rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in Section b)(1). of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
PE from the sanding operations shall not exceed 0.12 lbs/hr



Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

$$(\text{volume of sanding, cu. ft/unit}) \times (\text{density of particulate, lb/cu. ft}) \times (\text{maximum quantity of units sanded per hour}) \times (1 - \text{control efficiency of fabric filter control})$$

where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003
 maximum quantity of units sanded = 30 per hour
 control efficiency of fabric filter = 98% (assumes 100% capture)

b. Emission Limitation:

9.82 tons PE per rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

- (1) None.



18. P346, PA Line 1 Repair Sanding

Operations, Property and/or Equipment Description:

Line 1 on-line repair sanding

- 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>Particulate emissions (PE) from the sanding operations shall not exceed 0.54 lb/hr.</p> <p>Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed:</p> <p>8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO₂/hr; 1.16 tons of SO₂/yr; 46.93 lbs of NO_x/hr; 196.22 tons of NO_x/yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr.</p> <p>See Section b)(2)c. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D)	PE from emissions units P201, P205, and P346, shall not exceed 3.54 tons per rolling, 12-month period, excluding emissions from natural gas usage.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section c)(1) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling the emissions unit
- b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.
- c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The maximum number of sanded units for emissions units P201, P205, and P346 shall be limited by the following equation on a rolling 12-month basis:



$$3.54 \text{ tons PE} \geq \sum_{i=1}^n \frac{(P)(VS_i)(D_i)(1-RE_i)}{2000 \frac{\text{lb}}{\text{ton}}} + \sum_{j=1}^m \frac{(RP)(VS_j)(D_j)(1-RE_j)}{2000 \frac{\text{lb}}{\text{ton}}}$$

- P = number of units sanded, measured at PA - Off
- VS_i = average volume of sanding particles per unit
- D_i = density of sanding particles
- RE_i = removal efficiency of particle filtration system
- RP = number of repair units sanded in P346
- VS_j = average volume of sanding particles per unit
- D_j = density of sanding particles
- RE_j = removal efficiency of P346 particle filtration system

- (2) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

 (# of units processed through the repair line) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

 # units = recorded for Line 1 on-line repair
 - (2) The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
 - (3) The permittee shall maintain monthly records for emissions units P201, P205, and P346:
 - a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area; and
 - b. the total Line 1 rolling, 12-month production rate, in units (cars), measured at the "PA Off" area.
 - (4) The permittee shall maintain records the following records each calendar month:
 - a. the total summation of controlled PE emissions, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions, in tons PE per rolling, 12-month period.
 - (5) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In



the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the emission limitation of 3.54 tons/rolling, 12-month period; and
 - b. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

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

- (2) The permittee shall submit annual reports by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.54 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

$(\text{volume of sanding, cu. ft/unit}) \times (\text{density of particulate, lb/cu. ft}) \times (\text{maximum quantity of units sanded per hour}) \times (1 - \text{control efficiency of fabric filter control})$

where,

volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04

maximum quantity of units sanded = 29 per hour

control efficiency of fabric filter = 90% (assumes 100% capture).



b. Emission Limitation:

3.54 tons PE per rolling, 12-month period from emissions units P201, P205, and P346 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(4) above.

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

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

d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lbs of PE/hr;
26.25 tons of PE/yr;
0.26 lb of SO₂/hr;
1.16 tons of SO₂/yr;
46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

- g) Miscellaneous Requirements
 - (1) None.



19. R003, PA Line 2 Inner-Cavity Wax Application

Operations, Property and/or Equipment Description:

Line 2 inner cavity wax application with gas-fired makeup air

- 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 shall not exceed 4.7 lbs/gallon of coating applied, as daily volume-weighted average.</p> <p>Emissions from natural gas combustion in emission units, K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed:</p> <p>8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO₂/hr; 1.16 tons of SO₂/yr; 46.93 lbs of NO_x/hr; 196.22 tons of NO_x/yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr.</p> <p>PE from coating over spray shall not exceed 0.131 ton/yr.</p> <p>See Section b)(2)c. and b)(2)d. below.</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>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	Volatile organic compound emissions from coatings shall not exceed 55.3 tons per rolling 12 months. See Additional Terms & Conditions.
c.	OAC rule 3745-21-09(U)(2)(f)	Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from coating overspray shall not exceed 0.066 lb/hr.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-21-08(B)	See Section b)(2)d. below.
g.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII 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. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in the following section, Section b)(2)b., shall not exceed 1,176 tons VOC combined per rolling, 12-month period.
- b. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (online repair sanding, Line 1), P342 (Line 2 e-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)), Z355 (phosphating Line 2) and K240 (Line 1



LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in emissions estimations completed for demonstrating compliance with the emission limitation specified under Section b)(2)a.

- c. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

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

- d. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever spray coating is applied in this emissions unit
- (2) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_j = Destruction removal efficiency for emissions unit j (if applicable)



CE_i = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)

- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day (or month, per (1)d. below) for the inner-cavity wax operations:
- a. the name and identification of each coating, as applied;
 - b. the VOC content and the number of gallons of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,1}$; or
 - d. documentation showing daily volume-weighted average recordkeeping of the VOC per gallon is not required, if each and every coating applied in this emissions unit is at or below 4.7 pounds of VOC per gallon; this documentation for each material applied in R003 must be maintained on file and provided upon request, and recordkeeping may then be maintained monthly.
- (2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable Line 1/Line 2 facility VOC emission limits (Section b)(2)a.):
- a. the name and identification of each coating, reducing solvent, and other material employed;
 - b. the VOC content of each coating, reducing solvent, and other material employed;
 - c. the number of gallons of each coating, reducing solvent, and other material employed;
 - d. the total VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e.: the summation of the products of the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b); and
 - e. the rolling 12-month VOC emissions from R003, i.e., (d) + the previous 11 month calculation of this emission unit's emissions.



- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC limits:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emission units. These records and calculations shall be made available upon request.

- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emission units listed in Section d)(3)a., above:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e.: the summation of the products of the amounts (c) of all cleanup materials and purge materials



applied (a) in the emission units listed in Section d)(3)a., above, times each material's VOC content (b).

- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions unit subject to the applicable VOC emission limitation (Section b)(2)a.):
- a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;
 - c. the number of gallons of materials from the recovery tank shipped off site;
 - d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3)a., represented in the applicable VOC emission limitation (Section A.I.2.a), i.e., (c) x (d).
- (6) The permittee shall maintain monthly records in order to document the rolling 12-month emissions from the Line 1 and Line 2 emission units, which contain the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in the emission units K201, K206, K208, R102, R103, and R003,
 - b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3)a., subject to the applicable emission limitation in Section b)(2)a.;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(4)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the limit in Section b)(2)a., recorded and calculated as per Section d)(4);
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emission units contained in the applicable VOC emissions limit (Section b)(2)a.), in pounds or tons per month, i.e., (a) + (b) - (c); and
 - e. the rolling 12-month total VOC emissions from Line 1 and Line 2 emission units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.



- (7) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when spray coating was applied in this emissions unit.
 - (8) In order to demonstrate compliance with the annual particulate limitation from over spray, the permittee shall maintain records for inner-cavity wax application of the following information:
 - a. the usage of each coating, in gallons;
 - b. the coating density of each coating, in pounds per gallon;
 - c. the solids content of each coating (weight percent);
 - d. the transfer efficiency of each coating applied;
 - e. the dry filtration system control efficiency; and
 - f. the calculated particulate emissions from over spray (i.e., $(a) \times (b) \times (c) \times (1-d) \times (1-e)$).
 - (9) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
 - (10) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly exceedance/deviation reports which identify any daily or monthly record showing the following:
 - a. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)a.; and
 - b. any calculated exceedance of the hourly or annual (Line 1 & Line 2) particulate emission limits from coating over spray, due to a malfunction of the control equipment or exceedance of the production limit on cars.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall notify the Ohio EPA Central District Office, in writing, of any daily or monthly record showing that the daily volume-weighted average VOC content exceeds 4.7 pounds per gallon. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.



- (3) The permittee shall submit quarterly deviation (excursion) reports of any record showing that the dry filtration system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (4) The permittee shall also submit annual reports that specify the total organic compound and particulate emissions 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.
 - (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in b)(2)b.

Applicable Compliance Method:

Compliance with this rolling 12-month facility VOC limit shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this limit, and as specified in Section d)(5). Any recycle/recovery credit shall be recorded and calculated as per Section d)(4), and applied as per Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials.

Monthly emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in Section d)(2), and the purge and cleanup materials as specified in Section d)(3).

Air emissions from cleanup/purge material usage from emissions units listed in Sections b)(2)b. &d)(3)a. shall be included in emissions estimations performed for demonstrating compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.
 - b. Emission Limitation:

4.7 lbs VOC/gallon of coating as a daily volume weighted average



Applicable Compliance Method:

Compliance with the daily volume-weighted average VOC limit for the cavity wax application shall be determined through recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions.

Calculations of the daily volume-weighted average shall follow those as specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc1. If complying coatings are used to meet the emission limitation, it is not necessary to calculate the daily volume-weighted average.

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

- 8.14 lbs of PE/hr;
- 26.25 tons of PE/yr;
- 0.26 lb of SO₂/hr;
- 1.16 tons of SO₂/yr;
- 46.93 lbs of NO_x/hr;
- 196.22 tons of NO_x/yr;
- 36.69 lbs of CO/hr;
- 160.71 tons of CO/yr;
- 2.50 lbs of VOC/hr; and
- 10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emission Limitation:

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



Applicable Compliance Method:

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).

e. Emission Limitation:

0.066 pound particulate emissions/hr from coating over spray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration system found in Sections c)(1), d)(6), and e)(3). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-3(B)(10).

f. Emission Limitation:

0.131 ton particulate emissions/yr from coating over spray

Applicable Compliance Method:

Compliance with the annual particulate limit may be determined by the recordkeeping required in Section d)(8).

g. Emission Limitation:

55.3 tons VOC per rolling 12 months from coatings

Applicable Compliance Method:

Compliance with this rolling 12-month VOC limit shall be determined through the permit requirements and recordkeeping specified in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings and reducing solvents.

h. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



20. R102, PA Line 1 Sealer/Deadener Application

Operations, Property and/or Equipment Description:

Line 1 sealer/deadner application with gas-fired makeup air and heated flush zone

- 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)	VOC emissions shall not exceed 0.3 lb/gallon of coating applied, excluding water and exempt solvents. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO ₂ /hr; 1.16 tons of SO ₂ /yr; 46.93 lbs of NO _x /hr; 196.22 tons of NO _x /yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr. See Section b)(2)d. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i), and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See Additional Terms and Conditions.
c.	OAC rule 3745-21-09(U)(1)(i)	The emission limitation specified by this rule is less stringent than the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-08(B)	See Section b)(2)c. below.
e.	40 CFR Part 63, Subpart IIII	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in the following section, Section b)(2)b., shall not exceed 1,176 tons VOC combined per rolling, 12-month period.
- b. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (on-line repair sanding, Line 1), P342 (Line 2 e-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)), Z355 (phosphating Line 2) and K240 (Line 1 LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in emissions estimations completed for demonstrating compliance with the emission limitation specified under Section b)(2)a.
- c. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-



08, the requirement to satisfy "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- d. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) Operational Restrictions

- (1) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_i = Destruction removal efficiency for emissions unit j (if applicable)

CE_i = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)

- (2) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the sealer/deadener application:



- a. the name and identification of each coating applied; and
- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable Line 1/Line 2 facility VOC emission limits (Section b)(2)a.):

- a. the name and identification of each coating, reducing solvent, and other material employed;
- b. the VOC content of each coating, reducing solvent, and other material employed;
- c. the number of gallons of each coating, reducing solvent, and other material employed; and
- d. the total VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC emission limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/surfacer
K237-Line 2 Topcoat



K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emission units. These records and calculations shall be made available upon request.

- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3)a., above:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied (a) in the emissions units listed in Section d)(3)a., above, times each material's VOC content (b).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (Section b)(2)a.):
- a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;
 - c. the number of gallons of materials from the recovery tank shipped off site;
 - d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total OC/VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R003, R102, and R103 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3)a., represented in the applicable VOC emission limitation (Section b)(2)a.), i.e., (c) x (d).



- (6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:
 - a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103, K002, K003, K004, R002, and R003;
 - b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3)a., subject to the applicable emission limitation in Section b)(2)a.;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(4)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the applicable emission limitations in Section b)(2)a., recorded and calculated as per Section d)(4);
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units contained in the applicable VOC emission limitations (Section b)(2)a.), in pounds or tons per month, i.e., (a) + (b) - (c); and
 - e. the rolling, 12-month total VOC emissions from Line 1 and Line 2 emissions units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.
 - (7) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
 - (8) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)a.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of non-complying coatings, in exceedance of 0.3 lb VOC/gal, minus water and exempt solvents. The notification shall include a copy of such record



and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

- (3) The permittee shall also submit annual reports that specify the total VOC and particulate emissions 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.
- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

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:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in Section b)(2)b.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit subject to this emission limitation, and as specified in Section d)(5). Any recycle/recovery credit shall be recorded and calculated as per Section d)(4), and applied as per Section d)(5). Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials. Monthly emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in Section d)(2), and the purge and cleanup materials as specified in Section d)(3).

Air emissions from cleanup/purge material usage from emissions units listed in Sections b)(2)b. and d)(3)a. shall be included in emissions estimations performed for demonstrating compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.

b. Emission Limitation:

0.3 lb VOC/gallon of coating excluding water and exempt solvents



Applicable Compliance Method:

Compliance with this emission limitation for the sealer/deadener application shall be determined through monthly recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound and water contents of the coatings and materials. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lbs of PE/hr;
26.25 tons of PE/yr;
0.26 lb of SO₂/hr;
1.16 tons of SO₂/yr;
46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111797
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



21. R103, PA Line 1 Inner-Cavity Wax Application

Operations, Property and/or Equipment Description:

Line 1 inner cavity wax application with gas-fired makeup air

- 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 shall not exceed 4.7 lbs/gallon of coating applied, as daily volume-weighted average.</p> <p>Emissions from natural gas combustion in emission units, K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed:</p> <p>8.14 lbs of PE/hr; 26.25 tons of PE/yr; 0.26 lb of SO₂/hr; 1.16 tons of SO₂/yr; 46.93 lbs of NO_x/hr; 196.22 tons of NO_x/yr; 36.69 lbs of CO/hr; 160.71 tons of CO/yr; 2.50 lbs of VOC/hr; and 10.90 tons of VOC/yr.</p> <p>PE from coating over spray shall not exceed 0.142 ton/yr.</p> <p>See Section b)(2)c .and b)(2)f. below.</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>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	Volatile organic compound emissions from coatings shall not exceed 43.7 tons per rolling 12 months. See Additional Terms & Conditions.
c.	OAC rule 3745-21-09(U)(2)(f)	Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
d.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from coating overspray shall not exceed 0.071 lb/hr.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-21-08(B)	See Section b)(2)d. below.
g.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Coating and cleanup/purge emissions from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge emissions from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge emissions from the emissions units listed in the following section, Section b)(2)b., shall not exceed 1,176 tons VOC combined per rolling, 12-month period.
- b. Air emissions from cleanup/purge material usage from emissions units Z147 (phosphating Line 1), P201 (E-coat sanding booth, Line 1), P205 (primer sanding booth, Line 1), K007 (final repair booths and ovens, Lines 1 and 2), K011 (PA Application Testing Facility (ATF)), K227 (wheel well blackout, Line 1), K228 (wheel well blackout, Line 2), P346 (online repair sanding, Line 1), P342 (Line 2 e-coat sanding), P343 (Line 2 surfacer sanding), P344 (Line 2 repair sanding), R016 (PA Material Test Lab (MTL)), Z355 (phosphating Line 2) and K240 (Line 1 LASD) associated with operation of Line 1 and Line 2 in the Marysville Auto Plant paint department, shall be recorded, maintained, calculated for recovery emissions credit, reported, and considered covered under and included in emissions estimations completed for demonstrating compliance with the emission limitation specified under Section b)(2)a.
- c. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.



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

- d. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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). of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

c) **Operational Restrictions**

- (1) The permittee shall operate the dry filtration system whenever spray coating is applied in this emissions unit
- (2) The maximum coating and cleanup/purge use from Line 1 (K201, K206, K208, R102, and R103) and R003, cleanup/purge use from Line 2 (K235, K236, K237, K238, K239), and cleanup/purge use from the emissions units listed in b)(2)d, combined shall be limited by the following equation on a rolling 12-month basis:

$$1,176 \text{ tons} \geq \sum_{j=1}^m \left(\sum_{i=1}^n \frac{(U_{ij})(VOC_{ij})(1 - (DRE_j)(CE_j))}{2000 \frac{\text{lb}}{\text{ton}}} \right) - \sum_{k=1}^p \left(\frac{(R_k)(VOC_k)}{2000 \frac{\text{lb}}{\text{ton}}} \right)$$

Where:

U_{ij} = volume of coating, cleanup, or purge i (gallons) used in emissions unit j

VOC_{ij} = VOC content of coating, cleanup, or purge i (lb/gal) used in emissions unit j

DRE_i = Destruction removal efficiency for emissions unit j (if applicable)

CE_i = Capture efficiency for emissions unit j (if applicable)

R_k = Recovered purge/cleanup k (gallons)

VOC_k = VOC content of recovered purge/cleanup k (lb/gal)

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day (or month, per (1)d. below) for the inner-cavity wax operations:



- a. the name and identification of each coating, as applied;
 - b. the VOC content and the number of gallons of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for C_{voc} ; or
 - d. documentation showing daily volume-weighted average recordkeeping of the VOC per gallon is not required, if each and every coating applied in this emissions unit is at or below 4.7 pounds of VOC per gallon; this documentation for each material applied in R103 must be maintained on file and provided upon request, and recordkeeping may then be maintained monthly.
- (2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable Line 1/Line 2 facility VOC emission limit (Section b)(2)a.):
- a. the name and identification of each coating, reducing solvent, and other material employed;
 - b. the VOC content of each coating, reducing solvent, and other material employed;
 - c. the number of gallons of each coating, reducing solvent, and other material employed;
 - d. the total VOC emissions from all coatings, reducing solvents, and/or other materials employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e.: the summation of the products of the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b); and
 - e. the rolling 12-month VOC emissions from R003, i.e., (d) + the previous 11 month calculation of this emission unit's emissions.
- (3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding



R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating

The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emission units. These records and calculations shall be made available upon request.

- (4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emission units listed in Section d)(3)a., above:
- a. the name and identification of each cleanup/purge material;
 - b. the VOC content of each cleanup/purge material, in pounds per gallon;
 - c. the number of gallons of each cleanup/purge material employed; and
 - d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e.: the summation of the products of the amounts (c) of all cleanup materials and purge materials applied (a) in the emission units listed in Section d)(3), above, times each material's VOC content (b).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions unitssubject to the applicable VOC emission limitation (Section b)(2)a.):
- a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;
 - c. the number of gallons of materials from the recovery tank shipped off site;



- d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), represented in the applicable VOC emission limitation (Section b)(2)a.), i.e., (c) x (d).
- (6) The permittee shall maintain monthly records in order to document the rolling 12-month emissions from the Line 1 and Line 2 emission units, which contain the following information:
- a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in the emission units K201, K206, K208, R102, R103, and R003,
 - b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3), subject to the applicable emission limitation in Section b)(2)a.;
 - c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(4)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, to demonstrate compliance with the limit in Section b)(2)a., recorded and calculated as per Section d)(4);
 - d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emission units contained in the applicable VOC emissions limit (Section b)(2)a.), in pounds or tons per month, i.e., (a) + (b) - (c); and
 - e. the rolling 12-month total VOC emissions from Line 1 and Line 2 emission units, i.e., (d) + the previous 11 month calculation of the Line 1/Line 2 emissions.
- (7) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when spray coating was applied in this emissions unit.
- (8) In order to demonstrate compliance with the annual particulate limitation from over spray, the permittee shall maintain records for inner-cavity wax application of the following information:
- a. the usage of each coating, in gallons;
 - b. the coating density of each coating, in pounds per gallon;
 - c. the solids content of each coating (weight percent);
 - d. the transfer efficiency of each coating applied;



- e. the dry filtration system control efficiency; and
 - f. the calculated particulate emissions from over spray (i.e., $(a) \times (b) \times (c) \times (1-d) \times (1-e)$).
- (9) The permittee shall track and record natural gas usage in emissions units K201, K206, K208, R003, R102, R103, P201, P205, and P346 by using the facility's current natural gas tracking method for estimating monthly usage (i.e., subtracting the natural gas usage at the meters not monitoring the paint lines from the main facility meter usage). In the future, the permittee may track natural gas usage for these emissions units by installing dedicated metering devices.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly exceedance/deviation reports which identify any daily or monthly record showing the following:
 - a. any exceedance of the applicable rolling, 12-month VOC emission limitation specified in Section b)(2)a.; and
 - b. any calculated exceedance of the hourly or annual (Line 1 & Line 2) particulate emission limits from coating over spray, due to a malfunction of the control equipment or exceedance of the production limit on cars.
- The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
- (2) The permittee shall notify the Ohio EPA Central District Office, in writing, of any daily or monthly record showing that the daily volume-weighted average VOC content exceeds 4.7 pounds per gallon. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.
 - (3) The permittee shall submit quarterly deviation (excursion) reports of any record showing that the dry filtration system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (4) The permittee shall also submit annual reports that specify the total organic compound and particulate emissions 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:



a. Emissions Limitation:

1,176 tons VOC per rolling, 12-month period from Line 1 and R003, cleanup/purge from Line 2, and cleanup/purge from the emissions units listed in b)(2)b.

b. Applicable Compliance Method:

Compliance with this rolling 12-month facility VOC limit shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this limit, and as specified in Section d)(5). Any recycle/recovery credit shall be recorded and calculated as per Section d)(4), and applied as per Section d)(5). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of primer/guide coatings, topcoats, reducing solvents, purge and cleanup materials.

Monthly emissions from coatings and reducing solvents from this emissions unit shall be recorded and calculated as specified in d)(2), and the purge and cleanup materials as specified in Section d)(3).

Air emissions from cleanup/purge material usage from emissions units listed in Sections b)(2)b. &d)(3) shall be included in emissions estimations performed for demonstrating compliance with the applicable VOC emission limitation. Current permitted requirements and permitted limitations for these emissions units shall be maintained as required in the current permits for each emissions unit.

c. Emission Limitation:

4.7 lbs VOC/gallon of coating as a daily volume weighted average

Applicable Compliance Method:

Compliance with the daily volume-weighted average VOC limit for the cavity wax application shall be determined through recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions.

Calculations of the daily volume-weighted average shall follow those as specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc1. If complying coatings are used to meet the emission limitation, it is not necessary to calculate the daily volume-weighted average.

d. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

- 8.14 lbs of PE/hr;
- 26.25 tons of PE/yr;
- 0.26 lb of SO₂/hr;
- 1.16 tons of SO₂/yr;



46.93 lbs of NO_x/hr;
196.22 tons of NO_x/yr;
36.69 lbs of CO/hr;
160.71 tons of CO/yr;
2.50 lbs of VOC/hr; and
10.90 tons of VOC/yr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

e. Emission Limitation:

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

Applicable Compliance Method:

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).

f. Emission Limitation:

0.071 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration system found in Sections c)(1), d)(7), and e)(3). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-3(B)(10).

g. Emission Limitation:

0.142 ton particulate emissions/yr from coating over spray

Applicable Compliance Method:

Compliance with the annual particulate limit may be determined by the recordkeeping required in Section d)(9).



Draft Permit-to-Install
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h. Emission Limitation:

43.7 tons VOC per rolling 12 months from coatings

Applicable Compliance Method:

Compliance with this rolling 12-month VOC limit shall be determined through the permit requirements and recordkeeping specified in Section d)(2). Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings and reducing solvents.

g) Miscellaneous Requirements

(1) None.