



State of Ohio Environmental Protection Agency

Received
11/3/98
K. Heyob

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

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

October 30, 1998

CERTIFIED MAIL

cc: Tom Rittenhouse } Please
Todd Hermann } review
 } &
 } Comment
 } by 11/24/98

Re: Modification to Permit to Install No. 01-4184
Union County

Per T. Rittenhouse - no
& T. Hermann comments

Honda Marysville Auto Plant
Honda Parkway
Marysville, OH 43040

Attention: Karen Heyob

Enclosed please find a modification to the Ohio EPA Permit to Install referenced above which will modify the terms and conditions.

Very truly yours,

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

Enclosure

cc: US EPA
CENTRAL DISTRICT OFFICE, DAPC
PHIL HENDRIX, SWDO
APRIL BOTT, ATTORNEY GENERAL OFFICE



Permit to Install Terms and Conditions

Issuance Date: October 30, 1998
Effective Date: October 30, 1998

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFICATION TO PERMIT TO INSTALL

Name of Applicant: Honda Marysville Auto Plant
Address: Honda Parkway
City: Marysville, OH
Telephone Number: (513) 642-5000

The Ohio EPA has received a request for a modification for the Ohio EPA Permit to Install referenced above.

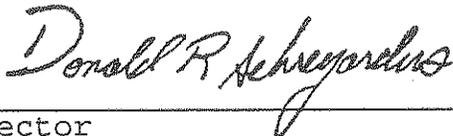
The Permit to Install issued to Honda Marysville Auto Plant, Permit to Install No. 01-4184 is modified in the following manner:

Terms and Conditions on pages 3 thru 7 of Permit to Install issued on March 2, 1994.

The reason for the modification is: to delete Permit to Operate Application term; modify the Air Emission Summary; delete PSD Requirements, Record(s) Retention and Availability, and Reporting Requirements; revise Additional Special Terms and Conditions in PTI No. 01-4184, issued March 2, 1994, due to EBR Case No. 803139.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

Ohio Environmental Protection Agency



Director



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor
Donald R. Schregardus
Director

Re: Permit to Install
Union County
Application No: 01-4184
PSD
TOXIC REVIEW

CERTIFIED MAIL

March 2, 1994

HONDA MARYSVILLE AUTO PLANT
KAREN HEYOB
HONDA PARKWAY
MARYSVILLE, OH 43040

CORRECTED COPY

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CENTRAL DISTRICT OFFICE, DAPC
PHIL HENDRIX, SWDO



Permit to Install Terms and Conditions

Application No. 01-4184
APS Premise No. 0180000130
Permit Fee: \$400.00

Name of Facility: HONDA MARYSVILLE AUTO PLANT

Person to Contact: KAREN HEYOB

Address: HONDA PARKWAY
MARYSVILLE, OH 43040

Location of proposed source(s): HONDA PARKWAY
MARYSVILLE, OHIO

Description of proposed source(s):
2 WELD SEALER WIPE PROCESSES (LINE 1 AND 2).

Date of Issuance: March 2, 1994

Effective Date: March 2, 1994

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to

HONDA MARYSVILLE AUTO PLANT

Application NO. 01-4184

Page 3 of 8

March 2, 1994

the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for HONDA MARYSVILLE AUTO PLANT located in Union County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R023	Weld Sealer Body Wipe Line 1	Compliance with permitted limits and applicable rules	3745-31-05 3745-21-07 (G) (9) (f)	4.3 pounds OC/gallon material; emissions from R023 and R024 shall not exceed 14.0 tons OC per rolling 12-months; Material use from R023 and R024 shall not exceed 6,651 gallons of non-photochemically reactive materials or materials exempt under 3745-21-07(G) (9) per rolling 12-months
R024	Weld Sealer Body Wipe Line 2	Compliance with permitted limits and applicable rules	3745-31-05 3745-21-07 (G) (9) (f)	4.3 pounds OC/gallon material; emissions from R023 and R024 shall not exceed 14.0 tons OC per rolling 12-months; Material use from R023 and R024 shall not exceed 6,651 gallons of non-photochemically reactive materials or materials exempt under 3745-21-07(G) (9) per rolling 12-months
				See Additional Special Terms and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	14.0

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 2305 Westbrooke Drive, Bldg. C, Box 2198, Columbus, Ohio 43266-2198.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

A. Restriction on Organic Compound Materials

1. Only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt under 3745-21-07(G)(9), can be applied to components in these sources.
2. These sources, R023 and R024, shall be limited to a total material usage of 6,651 gallons of organic compound (OC) containing materials in any rolling 12-month period.
3. The OC content of materials used in these sources shall not exceed 4.3 pounds of OC per gallon of material.

B. Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the weld wipe operations:
 - a. the company identification for each OC containing material employed;
 - b. documentation on the content of each material employed to show that only non-photochemically reactive materials are applied in these sources and the total organic compound content of each material, in pounds per gallon; and
 - c. the number of gallons of OC containing material used in these sources; and the rolling 12-month total of material usage in gallons.

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

These documents and records, as well as, any supporting solvent analyses and computations, shall be retained at the facility for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review upon verbal or written request.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information if a photochemically reactive material is applied to components welded in these sources:
 - a. an identification of each day and the duration of time during which a photochemically reactive material was used;
 - b. an identification of the photochemically reactive material used and it's composition; and,
 - c. an identification of the amount of photochemically reactive material used on the occasion of the deviation.

Deviation reports shall be sent to the Central District Office within 45 days after any use of a photochemically reactive material.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from these sources for the previous calendar year. These reports shall be satisfied by including these sources in the submission of the annual Fee Emission Report.

D. Compliance Testing Requirements

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

a. Emission Limitation

14.0 tons VOC total per rolling 12-months from R023 and R024

6,651 total gallons of non-photochemically reactive material or materials exempt under 3745-21-07(G)(9) per rolling 12-months used in sources R023 and R024.

Applicable Compliance Method

Compliance with the rolling 12-month VOC and usage limit shall be determined through monthly and 12-month rolling recordkeeping of material usage, the organic compound content of each material used, and the rolling 12-month summation of calculated VOC emissions. Formulation data from the manufacturer of the material or USEPA Method 24 shall be used to determine the organic compound content of the weld sealer body wipe solvent blend, to be used in the calculation of emissions. Compliance test methods and procedures shall follow those specified in OAC rule 3745-21-10(B).

b. Emission Limitation

4.3 pounds OC/gallon of material

Applicable Compliance Method

Formulation data from the manufacturer of the material or USEPA Method 24 shall be used to determine the organic compound content of the weld sealer body wipe solvent blend, to be used in the verification of this limit. Compliance test methods and procedures shall follow those specified in OAC rule 3745-21-10(B).

E. Permit to Operate/Title V

1. The term entitled "Permit to Operate Application" will be satisfied by adding these sources, through an update, to the Title V application which has already been submitted.

Synthetic Minor & PSD Determination

1. Source Description

Honda of America, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April, 1996 Honda submitted a Title V application for the facility. Honda has appealed and requested modifications to the Permit to Install (PTI) numbered 01-4184, issued 10/14/93 for the weld sealer wipe processes for lines 1 and 2. The PTI #01-4184, issued 10/14/93, was also a modification to these sources in which 1,1,1 trichloroethane was replaced with the non-photochemically reactive solvent which is now used.

2. Facility Emissions and PSD Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. Honda has requested that this permit be issued with federally enforceable limits for annual solvent usage and solvent organic compound (OC) content, and that this permit be issued as a Synthetic Minor.

3. New Source Emissions

The maximum potential OC emissions from these sources cannot be determined because this is a manual surface-wiping process to remove excess weld sealer from auto bodies. Honda is proposing federally enforceable permit restrictions of 6,651 gallons of solvent usage on a rolling-12 month basis and a maximum of 4.3 pounds of OC per gallon of solvent, excluding water, to be used in these sources, R023 and R024. The potential to emit, with these restrictions will be 14 tons of OC per year. This is a reduction of 43.6 tons of OC emissions from the original permitted limit of 57.6 tons of OC in PTI #01-4184.

4. Conclusion

Honda has requested that the weld sealer wipe process PTI be issued as a Synthetic Minor with federally enforceable permit restrictions on the gallons of solvent used on a rolling-12 month basis and restrictions on the organic compound content of the solvent(s) used in these sources, R023 and R024. The sources will be limited to 6,651 gallons of solvent usage in any 12-month rolling period, and a maximum of 4.3 pounds of OC per gallon of solvent, excluding water. This will limit the sources to 14 tons per rolling 12 months.

Best Available Technology (BAT) for sources R023 and R024 will be the use of solvents with no more than 4.3 pounds of OC per gallon of solvent, excluding water.