



11/21/2013

Stephen Fogle
Honda Engineering North America, Inc.
Marysville Automobile Plant
24000 Honda Parkway
Marysville, OH 43040-9251

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0180010199
Permit Number: P0113354
Permit Type: Administrative Modification
County: Union

Certified Mail

Table with 2 columns: Status (No) and Category (TOXIC REVIEW, PSD, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MAJOR NON-ATTAINMENT, MODELING SUBMITTED, MAJOR GHG, 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 Engineering North America, Inc.

Issue Date: 11/21/2013  
Permit Number: P0113354  
Permit Type: Administrative Modification  
Permit Description: Administrative modification to establish Plantwide Applicability Limits (PAL) for the major stationary source comprised of the following facilities located on contiguous property in Union and Logan Counties: Marysville Automobile Plant, East Liberty Automobile Plant, Honda North American Engineering, Honda Company Facilities, Honda Performance Manufacturing Center ("Honda S-Line"), and Midwest Express, Inc.  
Facility ID: 0180010199  
Facility Location: Honda Engineering North America, Inc.  
24000 Honda Parkway,  
Marysville, OH 43040-9251  
Facility Description: Special Die and Tool, Die Set, Jig, and Fixture Manufacturing, Conveyor and Conveying Equipment 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



STAFF DETERMINATION FOR THE APPLICATION FOR A PLANTWIDE APPLICABILITY LIMIT (PAL) PERMIT FOR HONDA OF AMERICA MFG., INC.'S MARYSVILLE AUTOMOBILE PLANT, EAST LIBERTY AUTOMOBILE PLANT, HONDA NORTH AMERICAN ENGINEERING, HONDA COMPANY FACILITIES, HONDA PERFORMANCE MANUFACTURING CENTER, AND MIDWEST EXPRESS, INC.

Introduction

The Clean Air Act and regulations promulgated thereunder allow for the use of a Plantwide Applicability Limit (PAL) permit for any existing major stationary source provided the PAL meets the requirements contained in the PAL rule. The PAL permit imposes annual emission limitations for the entire major stationary source. The PAL permit provides major stationary sources the operational flexibility to make physical changes or changes in the method of operations provided that these changes do not increase total source-wide emissions above the PAL. Any physical change or change in the method of operation that would cause the source-wide emissions to equate or exceed a PAL requires a major modification to the PAL permit. Although the PAL permit allows for operational flexibility, major stationary sources permitted under a PAL must continue to comply with all applicable federal or state requirements, emission limitations, and work practice requirements that were established prior to the effective date of the PAL. Ohio's approved State Implementation Plan contains PAL requirements under OAC rule 3745-31-32.

The principal requirements of the PAL regulations are:

- 1) Permit application requirements
- 2) General requirements for establishing PALs
- 3) Contents of the PAL permit

On March 7, 2013, Honda of America Mfg., Inc. submitted a permit application for a PAL permit in accordance with OAC rule 3745-31-32 for VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The March 7, 2013, application was supplemented with an application submitted on October 28, 2013, for a PAL permit for greenhouse gas emissions.

Site Description

Honda of America Mfg., Inc.'s major stationary source is comprised of the following separately permitted facilities located on contiguous property in Union and Logan Counties.

Facility Name	Ohio EPA Facility ID Number
Marysville Automobile Plant	0180010193
East Liberty Automobile Plant	0546000117
Honda North American Engineering	0180010199
Honda Company Facilities	0180010197
Honda Performance Manufacturing Center	0180010413
Midwest Express, Inc.	0546000133

It is a major source of VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub> and PM<sub>2.5</sub>, and HAP emissions. Union and Logan Counties are in attainment for all regulated pollutants.

### Facility Description

The Marysville Automobile Plant manufactures automobiles and light-duty trucks on two assembly lines. Operations include metal stamping, thermoplastic part injection, plastic part painting, metal frame welding, main body painting, final vehicle assembly, vehicle QC testing, and final body coating repair. Support operations include industrial wastewater treatment, compressed air, building and process heating, process steam generation, and material handling.

The East Liberty Automobile Plant manufactures automobiles and light-duty trucks on one assembly line. Operations include metal stamping, thermoplastic part injection, plastic part painting, metal frame welding, main body painting, final vehicle assembly, vehicle quality testing, and final body coating repair. Support operations include industrial wastewater treatment, compressed air, building and process heating, process steam generation, and material handling.

Honda Engineering North America, Inc provides production equipment and tooling. Associates engineer, manufacture and install production systems for Honda's plants throughout North America. These systems include robots, fixtures and other equipment for welding, painting and assembling passenger cars and light trucks; dies and molds for metal stamping and plastic injection molding. Primary processes include plastic injection press for mold testing, stamping presses, machining, resistance and mig welding, and equipment assembly and trial areas.

Honda Company Facilities provides operations support to the Marysville Automobile Plant campus. They are responsible for roadways and parking areas, emergency generators, cold cleaners, welding, construction waste, and gasoline dispensing.

Honda Performance Manufacturing Center is a new small volume specialty auto assembly plant. Operations include main body painting, final vehicle assembly, and final body coating and repair. Support operations include building and process heating.

Midwest Express, Inc. (MEI) is a large complex of warehousing and light assembly buildings. Site activities include truck/trailer storage areas, fuel unloading, storage warehousing, a fuel station and offices. MEI provides Just in Time (JIT) delivery needs to the Honda plant. MEI will receive parts from an automotive supplier, organize/repackage the parts, deliver the parts when needed, receive the empty containers back, clean the empty containers and finally return the containers to the automotive supplier, which begins the cycle once again.

### Establishment of PALs

PALs were established for each pollutant in accordance with OAC rule 3745-31-32 as follows:

- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,121.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,060 and 2,102 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,081 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,121.2 tons per year on a rolling, 12-month basis.

- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) carbon monoxide (CO) emission limitation of 236 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2005 and 2006 of 139 and 134 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 99.9 tons of CO, the adjusted baseline actual facility-wide CO emissions are 236 tons per year on a rolling, 12-month basis.
- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) nitrogen oxides (NOx) emission limitation of 202.5 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NOx emissions from 2005 and 2006 of 164.7 and 160.4 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 162.6 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of NOx, the adjusted baseline actual facility-wide NOx emissions are 202.5 tons per year on a rolling, 12-month basis.
- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate matter (PM) emission limitation of 133.3 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM emissions from 2004 and 2005 of 107.6 and 109.2 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.4 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 24.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 133.3 tons per year on a rolling, 12-month basis.
- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>10</sub> emission limitation of 93.9 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>10</sub> emissions from 2004 and 2005 of 78.4 and 79.6 tons, respectively. Average facility-wide PM<sub>10</sub> emissions for 2004 and 2005 are 79.0 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM<sub>10</sub>, the adjusted baseline actual facility-wide PM<sub>10</sub> emissions are 93.9 tons per year on a rolling, 12-month basis.
- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>2.5</sub> emission limitation of 64.6 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 2004 and 2005 of 54.5 and 54.9 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 2004 and 2005 are 54.7 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM<sub>2.5</sub>, the adjusted baseline actual facility-wide PM<sub>2.5</sub> emissions are 64.6 tons per year on a rolling, 12-month basis.
- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.8 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SOx emissions from 2004 and 2005 of 2.8 and 2.9 tons, respectively. Average facility-wide SOx emissions for 2004 and 2005 are 2.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of SOx, the adjusted baseline actual facility-wide SOx emissions are 42.8 tons per year on a rolling, 12-month basis.

- The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) greenhouse gas (GHG) emission limitation of 264,580 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2005 and 2006 of 191,681 and 187,481 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,581 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 74,999 tons of GHG, the adjusted baseline actual facility-wide GHG emissions are 264,580 tons per year on a rolling, 12-month basis.

With the exception of maintenance activities and other trivial sources, the baseline emissions included all stack and fugitive emissions as well as startup, shutdown, and malfunction emissions to the extent that they could be quantified.

### Conclusion

This project will allow Honda of America Mfg., Inc.'s major stationary source greater operational flexibility without significant increases in actual emissions. Under the PAL permit, the source will be able to make physical changes or changes in the method(s) of operations provided major new source review thresholds are not exceeded and emissions remain under the PAL permit allowable emission rates. This will enable the source to institute operational changes quickly, thus providing a competitive business advantage in the automotive industry.



**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Honda Engineering North America, Inc.

Facility ID:	0180010199
Permit Number:	P0113354
Permit Type:	Administrative Modification
Issued:	11/21/2013
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Honda Engineering North America, Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	8
9. Reporting Requirements .....	8
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	10
14. Public Disclosure .....	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	23
1. P418 .....	24





**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0113354  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0180010199  
Facility Description: Engineering services, production tooling and equipment.  
Application Number(s): A0046889, A0049180  
Permit Number: P0113354  
Permit Description: Administrative modification to establish Plantwide Applicability Limits (PAL) for the major stationary source comprised of the following facilities located on contiguous property in Union and Logan Counties: Marysville Automobile Plant, East Liberty Automobile Plant, Honda North American Engineering, Honda Company Facilities, Honda Performance Manufacturing Center ("Honda S-Line"), and Midwest Express, Inc.  
Permit Type: Administrative Modification  
Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/21/2013  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Honda Engineering North America, Inc.  
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



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0113354  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

**Permit Number:** P0113354  
**Permit Description:** Administrative modification to establish Plantwide Applicability Limits (PAL) for the major stationary source comprised of the following facilities located on contiguous property in Union and Logan Counties: Marysville Automobile Plant, East Liberty Automobile Plant, Honda North American Engineering, Honda Company Facilities, Honda Performance Manufacturing Center ("Honda S-Line"), and Midwest Express, Inc.

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

<b>Emissions Unit ID:</b>	<b>P418</b>
Company Equipment ID:	P418
Superseded Permit Number:	P0108627
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0113354  
**Facility ID:** 0180010199  
**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) 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 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 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (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.
- c) 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 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) not exempt from the requirement to obtain a Permit-to-Install.

**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 permittee 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 "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- 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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" 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 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**



**Draft Permit-to-Install**

Honda Engineering North America, Inc.

**Permit Number:** P0113354

**Facility ID:** 0180010199

**Effective Date:** To be entered upon final issuance

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

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) B.8.
2. Establishment of Plantwide Applicability Limitations (PALs)
  - a) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,121.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,060 and 2,102 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,081 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,121.2 tons per year on a rolling, 12-month basis.
  - b) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) carbon monoxide (CO) emission limitation of 236 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2005 and 2006 of 139 and 134 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 99.9 tons of CO, the adjusted baseline actual facility-wide CO emissions are 236 tons per year on a rolling, 12-month basis.
  - c) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) nitrogen oxides (NOx) emission limitation of 202.5 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NOx emissions from 2005 and 2006 of 164.7 and 160.4 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 162.6 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of NOx, the adjusted baseline actual facility-wide NOx emissions are 202.5 tons per year on a rolling, 12-month basis.
  - d) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate matter (PM) emission limitation of 133.3 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM emissions from 2004 and 2005 of 107.6 and 109.2 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.4 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 24.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 133.3 tons per year on a rolling, 12-month basis.
  - e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>10</sub> emission limitation of 93.9 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>10</sub> emissions from 2004 and 2005 of 78.4 and 79.6 tons, respectively. Average facility-wide PM<sub>10</sub> emissions for 2004 and 2005 are 79.0 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM<sub>10</sub>,



the adjusted baseline actual facility-wide PM<sub>10</sub> emissions are 93.9 tons per year on a rolling, 12-month basis.

- f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>2.5</sub> emission limitation of 64.6 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 2004 and 2005 of 54.5 and 54.9 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 2004 and 2005 are 54.7 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM<sub>2.5</sub>, the adjusted baseline actual facility-wide PM<sub>2.5</sub> emissions are 64.6 tons per year on a rolling, 12-month basis.
- g) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.8 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SOx emissions from 2004 and 2005 of 2.8 and 2.9 tons, respectively. Average facility-wide SOx emissions for 2004 and 2005 are 2.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of SOx, the adjusted baseline actual facility-wide SOx emissions are 42.8 tons per year on a rolling, 12-month basis.
- h) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) greenhouse gas (GHG) emission limitation of 264,580 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2005 and 2006 of 191,681 and 187,481 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,581 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 74,999 tons of GHG, the adjusted baseline actual facility-wide GHG emissions are 264,580 tons per year on a rolling, 12-month basis.

3. Plantwide Applicability Limitations (PALs)

a) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) VOC emissions shall not exceed 2,121.2 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all emissions units that emit VOCs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. VOC emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.



b) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) CO emissions shall not exceed 236 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit CO at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. CO emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

c) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) NOx emissions shall not exceed 202.5 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NOx emissions on a rolling, 12-month basis from all emissions units that emit NOx at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. NOx emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

d) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM emissions shall not exceed 133.3 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM emissions on a rolling, 12-month basis from all emissions units that emit PM at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions



calculations based on either monthly usage records or worst-case potential. PM emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>10</sub> emissions shall not exceed 93.9 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM<sub>10</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM<sub>10</sub> at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM<sub>10</sub> emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>2.5</sub> emissions shall not exceed 64.6 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM<sub>2.5</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM<sub>2.5</sub> at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM<sub>2.5</sub> emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

g) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) SO<sub>x</sub> emissions shall not exceed 42.8 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO<sub>x</sub> emissions on a rolling, 12-month basis from all emissions units that emit SO<sub>x</sub> at the facility, (Premise numbers 0180010193,



0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. SO<sub>x</sub> emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

h) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) GHG emissions shall not exceed 264,580 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHGs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. GHG emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

4. PAL Monitoring and Recordkeeping Requirements

- a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's 12-month, rolling total emissions, for 5 years from the date of such record.
- b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:
  - (1) a copy of the PAL permit application and any applications for revisions to the PAL; and
  - (2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.
- c) The permittee shall monitor all emissions units at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) for VOC, PM<sub>2.5</sub>, PM<sub>10</sub>, PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS, and/or emission factors).
- d) Natural gas usage for process and building heat shall be monitored using the billing meters associated with the facility (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133). By using the billing meters, the permittee will have collected natural gas usage for significant and insignificant emission units located at the facility. Monthly VOC, PM<sub>2.5</sub>, PM<sub>10</sub>, PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and GHG emissions shall be calculated



from the monthly usage records and the applicable AP-42 emission factors. These emissions shall be included in the compliance demonstrations for each applicable Plantwide Applicability Limit specified in section B.3 of this permit. The permittee shall have the option to subtract natural gas usage associated with mobile sources from the billing records provided adequate records are maintained to substantiate the deduction.

5. PAL Reporting Requirements

a) The permittee shall submit semi-annual monitoring reports and prompt deviation reports to the Ohio EPA Central District Office and/or Southwest District Office based on the appropriate office and premise number of the emissions units' locations in accordance with the appropriate and applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:

(1) Semi-annual report:

The semi-annual report shall be submitted to the appropriate District Office within thirty days of the end of each reporting period. This report shall contain the following information:

- a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.
- b. Total annual emissions (tons per year) based on a twelve-month rolling total for each month in the reporting period recorded pursuant to B.3 of these terms and conditions.
- c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.
- d. A list of any emissions units modified or added to the major stationary source during the preceding six-month period.
  - i. The results of any modeling performed pursuant to B.8 of these terms and conditions for the new or modified emissions unit.
  - ii. The BAT determination information required under B.10 of these terms and conditions for the new or modified emissions unit.
- e. The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.
- f. A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of any



pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(A)(11)(g)).

- g. A signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(2) Deviation report:

The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to paragraph (A)(3)(c)(iii) of OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit. The reports shall contain the following information:

- a. the identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install;
- b. the PAL requirement that experienced the deviation or that was exceeded;
- c. emissions resulting from the deviation or the exceedance; and
- d. a signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(3) Re-validation results:

The owner or operator shall submit to the appropriate Ohio EPA District Office the results of any re-validation test or method conducted pursuant to OAC rule 3745-31-32(A)(11)(i) within three months after completion of such test or method.

6. PAL Compliance Demonstration

- a) Emission calculations to demonstrate compliance with the PAL include emissions from startups, shutdowns, and malfunctions.
- b) The permittee shall determine monthly VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions in accordance with the Monitoring and Recordkeeping Requirements for each emissions unit for the purpose of summing plant-wide VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions and determining the rolling, 12-month VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.



7. PAL Permit Requirements

- a) The PAL in section B shall be effective for ten years. The PAL term commences on the date of issuance of this permit.
- b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by the appropriate District Office within the time frame specified. (OAC rule 3745-31-32(A)(9)(b))
  - (1) If the permittee fails to meet the application requirements in section B or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(A)(8).
- c) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in a PAL provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.
  - (1) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the appropriate Ohio EPA District office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

8. The provisions of ORC 3704.03(F)(3) and (4) as well as OAC rule 3745-114 address Ohio's "Toxic Air Contaminant Statute" and the mechanism for evaluating certain air toxic contaminants from air emissions sources. The provisions of the regulation do not apply to a pollutant that is subject to a maximum achievable control technology (MACT) standard or residual risk standard under section 112 of the Federal Clean Air Act pursuant to the Ohio Revised Code (ORC) 3704.03(F)(4)(e).

For air contaminant sources not subject to a MACT standard, new installations or physical changes to or changes in the method of operation of any of the emissions units at the facility could affect the parameters used to determine whether or not the "Toxic Air Contaminant Statute" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Toxic Air Contaminant Statute" will be satisfied. If, upon evaluation, the permittee determines that the "Toxic Air Contaminant Statute" will not be satisfied, the permittee will not make the change without first obtaining Ohio EPA approval. Changes that can affect the parameters used in applying the "Toxic Air Contaminant Statute" include the following:

- a) New installation of an emissions unit that emits a toxic air contaminant identified under OAC rule 3745-114-01;
- b) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a toxic air contaminant with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously evaluated;
- c) 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 that was previously modeled; and



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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the new installation and/or changed emissions unit will still satisfy the "Toxic Air Contaminant Statute":

- e) A description of the parameters changed (composition of materials, new pollutants emitted, stack/exhaust parameters, etc.);
- f) Documentation of its evaluation and determination that the new installation and/or changed emissions unit satisfies the "Toxic Air Contaminant Statute"; and
- g) Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Toxic Air Contaminant Statute" for the change.

The results of any modeling shall be submitted with the semi-annual report.

New installations and physical changes to or changes in the method of operation of any emissions units at the facility that satisfy the "Toxic Air Contaminant Statute" do not require a new permit and/or permit modification.

In lieu of the above requirements, the permittee may devise its own method to demonstrate that the change(s) will satisfy the "Toxic Air Contaminant Statute" subject to approval by the Ohio EPA. This could include initial modeling under "worst case scenario" and evaluating whether or not each change would fall within that scenario and satisfy the "Toxic Air Contaminant Statute".

9. Best Available Technology (BAT) Limits For an Initial Installation or Modification under the PAL

a) Background

Under OAC rule 3745-31-05, all new or modified air contaminant sources, with the exception of sources subject to exemptions and permits-by-rule as defined in OAC rule 3745-31-03, must employ Best Available Technology (BAT) as defined in OAC rule 3745-31-01. BAT requirements have been defined for each air contaminant source contained in this permit.

Under ORC 3704.03(F)(2), no installation permit is required to be obtained for activities that occur under the Plantwide Applicability Limit (PAL) permit if the activities are subject to and in compliance with any applicable PAL and subject to and in compliance with any applicable PAL rules contained in OAC Chapter 3745-31.

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.

b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and



policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

- (1) Determination of the size and type of emissions unit that will be considered a “substantially similar source” for the BAT determination purposes.
  - (2) Researching emissions limits or work practices for known similar sources. At a minimum, the research should include reviewing the Ohio EPA BAT database, U.S. EPA’s BACT/RACT/LAER database, reviewing applicable state regulation limits (excluding severe non-attainment area regulations), and permits from other similar sources. Only “substantially similar sources” that have been demonstrated to operate satisfactorily in Ohio or other states with similar air quality should be included in this research.
  - (3) Completing a cost-effectiveness analysis following Ohio EPA, Division of Air Pollution Control Engineering Guide #46 for any pollutant where the uncontrolled potential-to-emit is greater than 70 tons per year. The uncontrolled potential-to-emit should take into account any federally enforceable limitations or physical limitations on the potential-to-emit.
  - (4) A determination of emission rate units to be used for the BAT determination. The units should be consistent with the units utilized in similar Ohio EPA issued emissions unit permits.
  - (5) A determination of the monitoring, recordkeeping, and reporting requirements for the BAT determination. The monitoring, recordkeeping, and reporting requirements shall be consistent with the monitoring, recordkeeping, and reporting requirements already established as part of the PAL permit.
  - (6) A determination of the compliance method to be used for the BAT determination. The compliance method shall be consistent with the compliance method utilized in the PAL permit for similar emissions units or in similar emissions unit permits issued by Ohio EPA.
  - (7) An evaluation of the above information and a determination concerning the selected BAT.
- c) The results of the BAT determination shall include, at a minimum, the following:
- (1) a description of the type of emissions unit evaluated;
  - (2) the numerical BAT value selected;
  - (3) the emission rate unit selected;
  - (4) a description of any associated control equipment selected as BAT;
  - (5) a description of any federally enforceable restrictions requested to be used; and
  - (6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.



The owner or operator may consult with Ohio EPA for assistance in determining an acceptable BAT determination.

- d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, recordkeeping, and reporting selected to support the BAT determination.
- e) The BAT determination selected by the owner or operator, and its associated monitoring, recordkeeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.
- f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plantwide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.9.b) through B.9.d), and the following paragraph, shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

#### 10. New or Modified Emissions Unit BAT Reporting

Under OAC rule 3745-31-32(A)(13)(a)(iv), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC rule 3745-31-32(A)(13)(a) for the required semi-annual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.9.b).

- 11. The terms and conditions contained in this permit shall supersede the terms and conditions for premise 0180010199 in Permit to Install (PTI) P0108627 issued 9/22/2011, for emissions unit P418.



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0113354  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P418**

**Operations, Property and/or Equipment Description:**

EGA Test Plastic Injection Molding Machine

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), as effective 11/30/01	VOC emissions shall not exceed 8.0 pounds (lb) per hour from mold release, mold cleaner, mold protectant, and wiping solvents.  VOC emissions shall not exceed 0.6 lb per hour from molding plastics.  See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c. below.
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.3
d.	OAC rule 3745-31-05(F), as effective 12/01/06	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code



(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. The hourly VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
  - i. The permittee has agreed to voluntarily limit the VOC emissions from this emission unit to less than 10 tons per year for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).
- d. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
  - i. Section b)(1)a., b)(1)b.;
  - ii. Section b)(2)a. through b)(2)c.; and
  - iii. Section f)(1)a.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each mold release, mold cleaner, mold protectant, and wiping solvent and type of pellet used in this emissions unit;
  - b. the number of gallons or pounds of each mold release, mold cleaner, mold protectant, and wiping solvent employed (gal/month);
  - c. the number of pounds of each molding pellet used (lb/month);



- d. the VOC content of each mold release, mold cleaner, mold protectant, and wiping solvent and plastic pellet, in pounds per gallon or pounds/pound, as provided by the manufacturer of the material (lbVOC/gal or VOC/lb material);
- e. the calculated VOC emissions from mold release, mold cleaner, mold protectant, and wiping solvent (number of gallons of each material used during the month x the organic compound content of the respective material, (b x d);
- f. the calculated VOC emissions from plastic molding (monthly pellet usage (pound/month) x ((3%) emissions factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/95) x (VOC content of plastic type)) / (2,000 lb/ton), (c x 0.03 x d);
- g. the calculated rolling, 12-month summation of total VOC emissions from mold release, mold cleaner, mold protectant, and wiping solvent employed, in tons; and
- h. the calculated rolling, 12-month summation of total VOC emissions from the molded plastic pellets, in tons.
- i. The rolling, 12-month summations in d)(1)g. and d)(1)h. above are calculated by summing emissions from the current month with emissions from the preceding eleven calendar months.

e) Reporting Requirements

- (1) None.

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 Limitations:

Less than 10 tons of VOC per year (as applicable after U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP)

Applicable Compliance Method:

Compliance with this limit may be determined through the recordkeeping specified in Section d)(1) above.

Emissions from plastic pellets will be calculated using the following formula:

Monthly plastic pellet injection emissions (ton/month) = sum (Monthly Pellet Usage (pound/month) x ((3%) emissions factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/95) x (VOC content of plastic type)) / (2,000lb/ton).



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.

**Permit Number:** P0113354

**Facility ID:** 0180010199

**Effective Date:** To be entered upon final issuance

U.S. EPA Method 24 or formulation data for the mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic shall be used to determine the VOC content of the materials to be used in the calculation of emissions.

g) Miscellaneous Requirements

- (1) None.