



3/28/2014

Mr. Robert Bottom
Honda of America Mfg., Inc., - Roadways
24000 Honda Parkway
Marysville, OH 43040-9251

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010197
Permit Number: P0113355
Permit Type: Administrative Modification
County: Union

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-CDO



Response to Comments

| | |
|---|--|
| Facility ID: | 0180010197 |
| Facility Name: | Honda of America Mfg., Inc., - Roadways |
| Facility Description: | Motor Vehicles and Car Bodies |
| Facility Address: | 24000 Honda Parkway Marysville, OH 43040-9251 Union County |
| Permit: | P0113355, Permit-To-Install - Administrative Modification |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Marysville Tribune on 12/04/2013. The comment period ended on 01/03/2014. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received during the draft issuance of permit P0113355. However, a change has been made to permit P0113355 as a result a comment received from Ms. Genevieve Damico of USEPA Region V, Chief, Air Permits Section on February 14, 2014. The comment and response to comment are provided below.

1. The permit on page 12 established the PALs. In establishing the PAL for Volatile Organic Compounds (VOC), the baseline actual facility-wide VOC emissions for 2004 and 2005 were used. The increase in VOC was stated at 39.9 tons of VOC to keep the increase below the Prevention of Significant Deterioration (PSD) threshold, which resulted in the adjusted baseline actual facility-wide VOC emissions of 2,121.2. It appears that the adjusted baseline of 2,121.2 is an increase of 40.2 tons of VOC, making the project major for PSD. Please provide justification for not considering this project major under PSD.

On March 17, 2014, Honda provided an updated/corrected PAL for VOC. The PAL for VOC has been changed from 2,121.2 tons per rolling, 12-month period to 2,125.9 tons per rolling, 12-month period. The limit is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below PSD of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 tons per year on a rolling, 12-month basis.



FINAL

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

Facility ID: 0180010197
Permit Number: P0113355
Permit Type: Administrative Modification
Issued: 3/28/2014
Effective: 3/28/2014



Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc., - Roadways

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 | 24 |
| 1. B418, ISG Emergency Generator..... | 25 |
| 2. B419, BRWP Emergency Generator | 30 |
| 3. F096, Roadways/Parking Areas..... | 35 |
| 4. F097, Concrete Pile | 42 |
| 5. F401, BRWP Material Handling and Dust Collector..... | 45 |



Authorization

Facility ID: 0180010197
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): A0046957, A0049182
Permit Number: P0113355
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: \$500.00
Issue Date: 3/28/2014
Effective Date: 3/28/2014

This document constitutes issuance to:

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

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

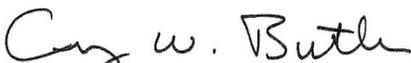
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0113355
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:

| | |
|-----------------------------------|---|
| Emissions Unit ID: | B418 |
| Company Equipment ID: | ISG Emergency Generator |
| Superseded Permit Number: | P0108652 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | B419 |
| Company Equipment ID: | BRWP Emergency Generator |
| Superseded Permit Number: | P0108652 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F096 |
| Company Equipment ID: | Roadways/Parking Areas |
| Superseded Permit Number: | 01-6423 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F097 |
| Company Equipment ID: | Concrete Pile |
| Superseded Permit Number: | 01-07327 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | F401 |
| Company Equipment ID: | BRWP Material Handling and Dust Collector |
| Superseded Permit Number: | 01-5903 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install
Honda of America Mfg., Inc., - Roadways
Permit Number: P0113355
Facility ID: 0180010197
Effective Date: 3/28/2014

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted 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

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.



Final Permit-to-Install
Honda of America Mfg., Inc., - Roadways
Permit Number: P0113355
Facility ID: 0180010197
Effective Date: 3/28/2014

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 2,125.9 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 VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 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 236.4 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 138.9 and 134.0 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136.4 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 236.4 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 203.0 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 165.2 and 160.9 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 163.1 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 203.0 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 133.1 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 107.4 and 109.0 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.2 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 133.1 tons per year on a rolling, 12-month basis.
 - e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM₁₀ emission limitation of 93.7 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 PM₁₀ emissions from 2004 and 2005 of 78.2 and 79.4 tons, respectively. Average facility-wide PM₁₀ emissions for 2004 and 2005 are 78.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM₁₀,



the adjusted baseline actual facility-wide PM₁₀ emissions are 93.7 tons per year on a rolling, 12-month basis.

- f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{2.5} emission limitation of 64.4 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_{2.5} emissions from 2004 and 2005 of 54.2 and 54.8 tons, respectively. Average facility-wide PM_{2.5} emissions for 2004 and 2005 are 54.5 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM_{2.5}, the adjusted baseline actual facility-wide PM_{2.5} emissions are 64.4 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 42.7 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 2.8 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 42.7 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 264,626 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 191,727 and 187,528 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,628 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 264,626 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 2,125.9 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 236.4 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 203.0 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 133.1 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) PM₁₀ emissions shall not exceed 93.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM₁₀ emissions on a rolling, 12-month basis from all emissions units that emit PM₁₀ 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. PM₁₀ 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_{2.5} emissions shall not exceed 64.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM_{2.5} emissions on a rolling, 12-month basis from all emissions units that emit PM_{2.5} 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_{2.5} 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_x emissions shall not exceed 42.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO_x emissions on a rolling, 12-month basis from all emissions units that emit SO_x 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_x 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 264,626 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_{2.5}, PM₁₀, PM, NO_x, CO, SO₂, 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_{2.5}, PM₁₀, PM, NO_x, CO, SO₂, 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 in accordance with the 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 Central 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 Ohio EPA, Central 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_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions in accordance with the Monitoring and Recordkeeping Requirements for each emissions unit for the purpose of summing plant-wide VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions and determining the rolling, 12-month VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} 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 Central 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 Ohio EPA, Central 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).

The following emissions unit at premise number 0180010197 is subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and is, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:

B419 (469 HP stationary diesel emergency generator).

In addition, if the toxic air contaminant is an organic Hazardous Air Pollutant (HAP) subject to the MACT standard identified above (40 CFR Part 63, Subpart IIII) and emitted by any air contaminant source not identified above, modeling in accordance with Ohio's "Toxic Air Contaminant Statute" is not required.

In the event any future MACT standards are deemed applicable to the facility and/or any air contaminant source(s) at the facility, those source(s) will not be subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs.

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 0180010197 in Permit to Install (PTI) P0108652 issued 10/4/2011, for emissions units B418 and B419; PTI 01-6423 issued 8/28/1996, for emissions unit F096; PTI 01-07327 issued 6/21/2000, for emissions unit F097; and PTI 01-05903 issued 8/4/1999, for emissions unit F401.

12. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions unit B418 is considered a "new limited use stationary reciprocating internal combustion engine" and therefore is not required to meet the requirements of the



subpart and of 40 CFR 63, Subpart A except for the initial notification requirements of 63.6645(d). It is considered "limited use" because it is operated less than 100 hours per year. If the permittee elects to operate this generator as a new affected source other than a limited use RICE then all of the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

13. The existing emergency compression ignition (CI) reciprocating internal combustion engine (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, Part 63, Subpart ZZZZ. The existing stationary CI RICE, B419, installed before 6/12/2006, shall meet the requirements of Part 63, Subpart ZZZZ no later than 5/3/2013.



Final Permit-to-Install
Honda of America Mfg., Inc., - Roadways
Permit Number: P0113355
Facility ID: 0180010197
Effective Date: 3/28/2014

C. Emissions Unit Terms and Conditions



1. B418, ISG Emergency Generator

Operations, Property and/or Equipment Description:

1073 HP stationary diesel emergency generator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | Emissions from this emissions unit shall not exceed: 25.34 pounds per hour (lb/hr) of nitrogen oxides (NO _x); 6.73 lb/hr of carbon monoxide (CO); 2.77 lb/hr of particulate emissions (PE); 4.00 lb/hr of sulfur dioxide (SO ₂); and 0.65 lb/hr of volatile organic compounds (VOC). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6), and 3745-17-07(A). See b)(2)(c). |
| b. | OAC rule 3745-31-32(A)(6) | The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} emissions apply to this emissions unit. The PALs for VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} are listed in the facility-wide terms and conditions in B.1. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} emissions from this facility as specified in B.2 |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| c. | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-11(B)(5)(b) | PE from the engine's exhaust shall not exceed 0.062 lb PE/mmBtu actual heat input. |
| e. | OAC rule 3745-18-06(G) | Exempt, pursuant to OAC rule 3745-18-06(B) because the rated heat input capacity is less than 10 mmBtu/hr. |
| f. | 40 CFR Part 63, Subpart ZZZZ | See b)(2)b. below. |

(2) Additional Terms and Conditions

- a. The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with these limits.
- b. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," this emissions unit is considered a "new limited use stationary reciprocating internal combustion engine" and therefore is not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A except for the initial notification requirements of 63.6645(d). It is considered "limited use" because it is operated less than 100 hours per year.

If the permittee elects to operate this generator as a new affected source other than a limited use RICE then all of the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.
- c. The emissions limitation specified by this rule is less stringent than the emissions limitation specified by OAC rule 3745-17-11(B)(5)(b).
- 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.; and
 - ii. Section f)(1)a.

c) Operational Restrictions

- (1) The permittee shall only burn diesel fuel, containing no greater than 0.5% sulfur by weight, in this emissions unit.



- (2) The maximum annual operating hours for this emissions unit shall not exceed 100 hours based upon a 12-month rolling summation. The permittee has existing records of the hours of operation for this emissions unit; therefore, the first year of accumulating monthly hours of operation limitation is not necessary.
 - (3) If the permittee elects to operate the generator as an existing affected source other than a limited use RICE then the restriction under c)(2) will no longer be applicable, and the operational restrictions of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall obtain and maintain records of the total quantity of oil received and the certification report from the fuel supplier for each shipment of diesel fuel (No. 2 fuel oil) received for burning in this emissions unit. The certification report shall include the most recent sampling results obtained by the fuel supplier preceding the delivery of fuel to the permittee. The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

Analyses for sulfur content shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D4294 and D7039), or equivalent methods as approved by the director.
 - (2) For each day during which the permittee burns a fuel other than diesel fuel in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
 - (3) The permittee shall maintain monthly records of the following information:
 - a. the total number of hours of operation of B418 for each month; and
 - b. the rolling 12-month summation of the hours of operation, calculated by adding the current month's hours of operation to the hours of operation for the preceding eleven calendar months.
 - (4) If the permittee elects to operate the generator as an existing affected source other than a limited use RICE, then all of the monitoring and/or recordkeeping requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.
- e) **Reporting Requirements**
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall include the type and quantity burned and shall be submitted within 30 days after the deviation occurs.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. any exceedance of the rolling 12-month maximum allowable cumulative hours of operation; and



- b. any exceedance of the sulfur content fuel restriction specified in Section c)(1) above.

These quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (4) If the permittee elects to operate the generator as an existing affected source other than a limited use RICE, then all of the reporting requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

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:

25.34 lbNO_x/hr
 6.73 lb CO/hr
 2.77 lb PE/hr*
 4.00 lb SO₂/hr
 0.65 lb VOC/hr

Applicable Compliance Method:

The above hourly limitations were established by multiplying the hourly heat input rating for the diesel generator of 7.92 mmBtu/hr by the appropriate emission factor below from U.S. EPA's AP-42, Volume I, Fifth Edition, Section 3.4, "Large Stationary diesel and All Stationary Dual-fuel Engines", Table 3.4-1, October 1996.

| <u>Pollutant</u> | <u>Emission Factor</u> |
|------------------|---|
| NO _x | 3.2 lb/mmBtu |
| CO | 0.85 lb/mmBtu |
| PE* | 0.35 lb/mmBtu |
| SO ₂ | 1.01 x (% sulfur content by weight, 0.5) lb/mmBtu |
| VOC | 0.0819 lb/mmBtu |

If required, emissions testing shall be conducted using the following test methods: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for PE, Method 7E for NO_x, Method 10 for CO, Method 6C for SO₂ and Methods 18, 25, or 25A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

*See Section f)(1)b.



b. Emission Limitation:

Particulate emissions from the engine exhaust shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 0.062 lb/mmBtu specified in Section b)(1). This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

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

Applicable Compliance Method:

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

- (2) If the permittee elects to operate the generator as an existing affected source other than a limited use RICE, then all of testing requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

g) Miscellaneous Requirements

- (1) None.



2. B419, BRWP Emergency Generator

Operations, Property and/or Equipment Description:

469 HP stationary diesel emergency generator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
| a. | OAC rule 3745-31-05(A)(3) | Emissions from this emissions unit shall not exceed: 15.41 pounds per hour (lb/hr) of nitrogen oxides (NO _x); 3.32 lb/hr of carbon monoxide (CO); 0.87 lb/hr of particulate emissions (PE); 1.01 lb/hr of sulfur dioxide (SO ₂); and 1.26 lb/hr of volatile organic compounds (VOC) The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-32(A)(6) and 3745-17-07(A). See Section b)(2)a. |
| b. | OAC rule 3745-31-32(A)(6) | The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} emissions apply to this emissions unit. The PALs for VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} are listed in the facility-wide terms and conditions in B.1. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO _x , CO, SO ₂ , GHG, PM, PM ₁₀ , and PM _{2.5} emissions from this facility as specified in B.2. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| c. | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-11(B)(5)(a) | PE from the engine's exhaust shall not exceed 0.310lb PE/mmBtu actual heat input. |
| e. | OAC rule 3745-18-06(G) | Exempt, pursuant to OAC rule 3745-18-06(B) because rated heat input capacity is less than 10 mmBtu/hr. |
| f. | 40 CFR Part 63, Subpart ZZZZ | See Section b)(2)b. |
| g. | 40 CFR Part 63, Subpart A | See Section b)(2)c. |

(2) Additional Terms and Conditions

- a. The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.
- b. The following work practice standards from Table 2c of 40 CFR Part 63, Subpart ZZZZ apply to this emissions unit:
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first (unless extended in accordance with the oil analysis program provided for under 40 CFR 63.6625(i));
 - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- c. Table 8 to Subpart ZZZZ of 40 CFR Part 63- "Applicability of General Provisions to Subpart ZZZZ" identifies which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
- 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.; and
 - ii. Section f)(1)a.



c) Operational Restrictions

- (1) The permittee shall only burn diesel fuel in this emissions unit.
- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ.
- (3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than diesel fuel in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (2) The permittee shall maintain monthly records of the total number of hours of operation for the purpose of calculating monthly emissions.
- (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ.
- (4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall include the type and quantity burned and shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ.
- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- (4) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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



a. Emission Limitations:

15.41 lb of NO_x/hr
3.32 lb of CO/hr
0.87 lb of PE/hr*
1.01 lb of SO₂/hr
1.26 lb of VOC/hr

Applicable Compliance Method:

The above hourly limitations were established by multiplying the hourly heat input rating for the diesel generator of 3.49 mmBtu/hr by the appropriate emission factor below from U.S. EPA's AP-42, Volume I, Fifth Edition, Section 3.3, "Gasoline and Diesel Industrial Engines", Table 3.3-1, October 1996.

Pollutant Emission Factor

NO_x 4.41 lb/mmBtu
CO 0.95 lb/mmBtu
PE* 0.25 lb/mmBtu
SO₂ 0.29 lb/mmBtu
VOC 0.36 lb/mmBtu

*See Section f)(1)b.

If required, emissions testing shall be conducted using the following test methods: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for PE, Method 7E for NO_x, Method 10 for CO, Method 6C for SO₂ and Methods 18, 25, or 25A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

b. Emission Limitation:

Particulate emissions from the engine exhaust shall not exceed 0.310lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 0.310lb/mmBtu specified in Section b)(1). This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

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



Applicable Compliance Method:

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

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.



3. F096, Roadways/Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas

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. | Paved roadways and parking areas (see Section b)(2)a.): OAC rule 3745-31-05(A)(3), PTI 01-6423 | No visible particulate emissions except for one minute during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)c., b)(2)d., b)(2)f., and b)(2)h. through b)(2)j.) |
| b. | Unpaved roadways and parking areas (see Section b)(2)b.): OAC rule 3745-31-05(A)(3), PTI 01-6423 | No visible particulate emissions except for three minutes during any 60-minute period Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)e., b)(2)f., b)(2)g., b)(2)i. and b)(2)j.) |
| c. | OAC rule 3745-31-32(A)(6) | The Plantwide Applicability Limitations (PALs) for facility-wide PM, PM ₁₀ , and PM _{2.5} emissions apply to this emissions unit. The PALs for PM, PM ₁₀ , and PM _{2.5} are listed in the facility-wide terms and conditions in B.1. The recordkeeping requirements in section d) contribute to the calculation of the total PM, PM ₁₀ , and PM _{2.5} emissions from this facility as specified in B.2 |



(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. Marysville Auto Plant

Paved Roadways

Gate B (Entrance), ALL EXIT GATE C
4-Lane Roadway – ONE WAY
Gate C (Exit)
4 Lane from ADC to FTZ
East Gate/Gate A, includes POPA, NW lot & MMC only
Drive to FTZ & 4 Lane
Plant Road – FTZ Gate to Container Yard
Gate T (Rear Entrance)
Roadway to Facilities
Roadway to AQQ
Drive to Short Track
Auto Short Test Track
Auto Long Test Track

Paved Parking Areas

EGA Parking Lot
POPA North Lot
FTZ Container Yard
HOO Parking Lot
East Associate Parking Lots

ii. Materials Management Center (MMC)

Paved Roadways and Parking Areas

MMC Entry Drive
MMC Test Track/Drive to Test Track
MMC Rec Area Drive & Parking
MMC Associate Parking Areas

iii. American Honda (AH) at the Marysville Auto Plant

Paved Roadways and Parking Areas

AH Drive from MAP
AH Associate Lot
AH Auto Lot/Parking Area
AH Shipping Yd. 1/C-Pad Lot
AH Shipping Yd. 2/Parking Area



- iv. Marysville Intermodal Terminal (MIT)

Paved Roadways and Parking Areas

MIT Main Entrance/Trans. Area
MIT Drive from MAP Container Yard

- v. Honda Associates Service Center (HSC),

Paved Roadways and Parking Area

Service Center Drive and Gas Plaza

- vi. Honda Sports Center (WMSC)

Paved Parking Area

Wellness Center Parking Lot

- vii. Honda Support Office of Administration (HSO)

Paved Roadways and Parking Areas

HSO Southwest Entrance Parking
HSO North Parking Area
HSO East/Northeast Parking Areas

- viii. Honda Federal Credit Union (HFCU)

Paved Roadway and Parking Area

HFCU Driveway/Parking Area

- ix. North American Logistics (NAL)

Paved Roadways and Parking Areas

NAL Gate F (Entrance) & Auto Parking
NAL East Dock Yard
NAL West Shipping Area/N. Dock Yard
NAL Gate G (Exit)
NAL Drive to East Dock Yard

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:



i. Honda of America

Unpaved Roadways and Parking Areas

MAP Access from Benton
BRWP Well Access Road #1
BRWP Well Access Road #2
MAP New Contractors Lot
NAL W. Rear Access Drive

- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to sweeping the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadway with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on the unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that



takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- k. This emissions unit is not located in an Appendix A area of OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply.
- l. 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. through b)(1)b.;
 - ii. Section b)(2)a. through b)(2)j.;
 - iii. Section d)(1) through d)(5);
 - iv. Section e)(1); and
 - v. Section f)(1).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform weekly inspections of all paved roadways and parking areas specified above.

After the permittee has performed weekly inspections of the paved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an



inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section d)(3).

- (2) Except as otherwise provided in this section, the permittee shall perform weekly inspections of all unpaved roadways and parking areas specified above.

After the permittee has performed weekly inspections of the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the unpaved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section d)(3).

- (3) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic condition. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (4) The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspection would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (5) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspection that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control after the end of each calendar quarter.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (2) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



4. F097, Concrete Pile

Operations, Property and/or Equipment Description:

Concrete and asphalt storage piles, from construction waste

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | Particulate emissions shall not exceed 0.375 ton per year. No visible particulate emissions except for one minute during any 60-minute period Reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections b)(2)b. through b)(2)d.) |
| b. | OAC rule 3745-31-32(A)(6) | The Plantwide Applicability Limitations (PALs) for facility-wide PM, PM ₁₀ , and PM _{2.5} emissions apply to this emissions unit. The PALs for PM, PM ₁₀ , and PM _{2.5} are listed in the facility-wide terms and conditions in B.2. |

(2) Additional Terms and Conditions

a. Only concrete and asphalt from the debris of the demolition of floors, roadways, parking areas and/or miscellaneous construction sources shall be added to the storage piles represented by this source.

b. Material added to these source piles shall contain sufficient moisture so as to minimize or eliminate visible emissions of fugitive dust caused by wind erosion.



- c. There shall be no visible particulate emission from the material storage piles except for a period of time not to exceed one minute during any 60-minute observation period.
- d. During the loading onto or removal from the concrete and asphalt storage piles, the drop height of the front-end loader shall be minimized in order to minimize or eliminate visible emission of fugitive dust.
- e. 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.;
 - ii. Section b)(2)a. through b)(2)d.;
 - iii. Section f)(1)a.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

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 Limitation

Particulate emissions shall not exceed 0.375 ton per year.

Applicable Compliance Method

Compliance with the annual particulate emissions limitation shall be determined at the end of every year, through calculation of worst case emissions. To determine the actual worstcase emission rate for particulate matter, emission factors, as supplied in the permit application, calculated from AP-42 sections titled "Aggregate Handling and Storage Piles" (0.01 pound/ton) and "Industrial Wind Erosion" (12.72 g/m²) shall be calculated and recorded as follows:



Emissions from wind erosion = maximum surface area (m²) x 0.0022 lb/gm x 12.72 g/m² x number of disturbances/year

Emissions from material handling = tons of material moved/year x 0.01 pound/ton.

These emissions were calculated on a conservative basis. Materials loaded and removed from these piles shall consist of asphalt and concrete from these piles shall consist of asphalt and concrete from the debris of the demolition of floors, roadways, and/or parking areas. Since it is highly unlikely that these limits could be exceeded due to the nature of the material content of the piles, no additional compliance determination is required.

g) Miscellaneous Requirements

- (1) None.



5. F401, BRWP Material Handling and Dust Collector

Operations, Property and/or Equipment Description:

Lime and Soda Ash unloading, storage, and feed system for water treatment plant

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | Particulate emissions shall not exceed 0.02 grain per dry standard cubic foot and 4.3 pounds per hour. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6). |
| b. | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| c. | OAC rule 3745-31-32(A)(6) | The Plantwide Applicability Limitations (PALs) for facility-wide PM, PM ₁₀ , and PM _{2.5} emissions apply to this emissions unit. The PALs for PM, PM ₁₀ , and PM _{2.5} are listed in the facility-wide terms and conditions in B.2. |

(2) Additional Terms and Conditions

a. 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.; and

ii. Section f)(1)b.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:

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

Applicable Compliance Method:

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

Particulate emissions shall not exceed 0.02 grain per dry standard cubic foot and 4.3 pounds per hour.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the grain loading and hourly emissions limitations in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.
- g) Miscellaneous Requirements
 - (1) None.