



4/11/2014

Certified Mail

Stephen Stutz  
Honda R & D North America Inc.  
21001 St. Rt. 739  
Raymond, OH 43067

Facility ID: 0180000156  
Permit Number: P0116589  
County: Union

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Marysville Tribune. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

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



PUBLIC NOTICE  
4/11/2014 Issuance of Draft Air Pollution Title V Permit

Honda R & D North America Inc.

21001 St. Rt. 739,  
Raymond, OH 43067

Union County

FACILITY DESC.: Testing Laboratories

PERMIT #: P0116589

PERMIT TYPE: Renewal

PERMIT DESC: Title V renewal permit for car and body engines - testing laboratory

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





## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0180000156
Facility Name:	Honda R & D North America Inc.
Facility Description:	Car and body engines - testing laboratory
Facility Address:	21001 St. Rt. 739, Raymond, OH 43067
Permit #:	P0116589, Renewal

This facility is subject to Title V because it is major for:

- Lead     Sulfur Dioxide     Carbon Monoxide     Volatile Organic Compounds     Nitrogen Oxides  
 Particulate Matter  $\leq$  10 microns     Single Hazardous Air Pollutant     Combined Hazardous Air Pollutants  
 Maximum Available Control Technology Standard(s)     GHG     Title IV

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>Added requirements for significant emissions units that have been installed since the issuance of the previous Title V: B027, B031, B032, B033, B035, B036, B037, B040, B041, B042, B052, B053, B054 and K005.</p> <p>Shutdown units have been removed from the Title V: B010, B016 and Z016.</p> <p>Applicable requirements have been revised to reflect PTIs that have been modified since the issuance of the previous Title V: P0115702 and P0116119.</p> <p>Added 40 CFR Part 63, Subpart ZZZZ requirements for B007, B008, B043 and B044.</p> <p>Added CAM requirements for B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054.</p>
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	Emissions units B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054 are required to have a CAM Plan for the control of CO and OC/VOC emissions.

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

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
B.2	31-05(D)		Federally enforceable limitations for CO to avoid PSD
B.3	31-05(D)		Federally enforceable limitations for HAPs to avoid MACT
B.4	31-05(D)		Federally enforceable operational restrictions to avoid PSD and MACT
B.5	77-07(C)(1)		Federally enforceable monitoring to avoid PSD
B.6	77-07(C)(1)		Federally enforceable monitoring and recordkeeping to avoid PSD
B.7	77-07(C)(1)		Federally enforceable monitoring and recordkeeping to avoid PSD
B.8	77-07(C)(1)		Federally enforceable recordkeeping to avoid PSD and MACT



B.9	77-07(C)(1)		Federally enforceable reporting to avoid PSD and MACT
B.10	77-07(C)(1)		Federally enforceable compliance demonstration to avoid PSD
B.11	77-07(C)(1)		Federally enforceable compliance demonstration to avoid MACT
B.12	77-07(C)(1)		Federally enforceable emissions testing to avoid PSD
B.13	77-07(A)(13)	40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
B.14	77-07(A)(13)	40 CFR Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
B.15	77-07(A)(13)	40 CFR Part 63, Subpart CCCCC	National Emissions Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities Area Sources
B.16		40 CFR Part 64	The facility shall comply with the provisions of the CAM plan during the operation of units B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054.
B.17	77-07(A)(13)		List of insignificant emissions units with applicable requirements.

**C. Emissions Unit Terms and Conditions**

<p>Key:</p> <p>EU = emissions unit ID</p> <p>ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)</p> <p>OR = operational restriction</p> <p>M = monitoring requirements</p> <p>ENF = did noncompliance issues drive the monitoring requirements?</p>	<p>R = record keeping requirements</p> <p>Rp = reporting requirements</p> <p>ET = emission testing requirements (not including compliance method terms)</p> <p>St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement</p> <p>Misc = miscellaneous requirements</p>
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**Statement of Basis**  
 Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
Facility-wide	Facility-wide: 249 TPY CO, based on a rolling, 12-month summation	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	OR: 100,000 gallons of gasoline per rolling, 12-month period in uncontrolled dynamometers; 540,000 gallons of gasoline per rolling, 12-month period in controlled dynamometers; 250 mcf of natural gas per rolling, 12-month period; 98% CO DRE  ET: RTO testing required every 5 years. Compliance determined through recordkeeping.
Facility-wide	Facility-wide: 9.9 TPY individual HAPs and 24.9 TPY combined HAPs, based on rolling, 12-month summations	31-05(D)		N	Y	Y	N	Y	Y	N	N	N	OR: 2,275 gallons of coatings per rolling, 12-month period; 750 gallons of cleanup materials per rolling, 12-month period  ET: Compliance determined through monitoring and recordkeeping of usage and material HAP content.
B005, B006, B011, K004, P005, P006	VE shall not exceed 20% opacity, as a 6- minute average	17-07(A) and 31- 05(A)(3)		N	Y	Y	N	Y	Y	N	N	N	OR, ET: These emissions units are considered inherently clean emissions units. The particulate emissions from the emissions units are due solely to the combustion of natural gas, and under normal operating conditions the emissions will not exceed the VE limitation. If required, VE observations may be required to demonstrate compliance with the VE limitation.
B005, B006, B011, K004,	0.020 lb PE/MMBtu	17-10(B) and 31- 05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Compliance is inherent based on the combustion of natural



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
P005, P006													gas. If required, testing may be required to demonstrate compliance.
B011	0.02 lb PE/hr 0.01 lb SO2/hr 1.22 lbNOx/hr 1.03 lb CO/hr	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly emissions limitations were established to reflect the potential to emit based on the burning of natural gas in the emissions unit. If required, testing may be required to demonstrate compliance.
B018, B040, B041	VE shall not exceed 20% opacity, as a 6-minute average	17-07(A) and 31-05(A)(3)		N	N	Y	N	Y	Y	N	N	N	ET: If required, VE observations may be required to demonstrate compliance with the VE limitation.
B018, B019, B052, B053, B054	0.310 lb PE/MMBtu	17-11(B)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Compliance is inherent based on the combustion of gasoline. If required, testing may be required to demonstrate compliance.
B018	0.07 lb PE/hr 0.30 TPY PE 0.053 lb SO2/hr 0.232 TPY SO2 1.02 lbNOx/hr 4.46 TPY NOx 2.18 lb OC/hr 9.55 TPY OC 9.82 lb CO/hr 43.0 TPY CO	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B019, B052, B053, B054	VE shall not exceed 20% opacity, as a 6-	17-07(A)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: These emissions units are considered inherently clean emissions units. The particulate



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
	minute average												emissions from the emissions units are due solely to the combustion of gasoline as vented to an RTO, and under normal operating conditions the emissions will not exceed the VE limitation. If required, VE observations may be required to demonstrate compliance with the VE limitation.
B019, B052, B053, B054	525,600 gallons of gasoline per rolling, 12-month period; vent CO and VOC emissions to an RTO with a 98% DRE	31-05(A)(3)	ORC 3704.03(T)	N	N	Y	N	Y	Y	Y	N	N	
B013, B014, B015, B035, B036, B037, B042, B027, B031, B032, B033	VE shall not exceed 20% opacity, as a 6-minute average	17-07(A) and 31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: These emissions units are considered inherently clean emissions units. The particulate emissions from the emissions units are due solely to the combustion of gasoline as vented to an RTO, and under normal operating conditions the emissions will not exceed the VE limitation. If required, VE observations may be required to demonstrate compliance with the VE limitation.
B040, B041, B013, B014, B015, B035, B036, B037,	0.310 lb PE/MMBtu	17-11(B) and 31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Compliance is inherent based on the combustion of gasoline. If required, testing may be required to demonstrate compliance.



**Statement of Basis**  
 Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B042, B027, B031, B032, B033													
B040	0.10 lb PE/hr 0.43 TPY PE 0.18 lb SO2/hr 0.77 TPY SO2	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B040	3.37 lbNOx/hr 14.74 TPY NOx 3.27 OC/hr 14.31 TPY OC 14.73 lb CO/hr 64.52 TPY CO		ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B041	0.06 lb PE/hr 0.28 TPY PE 0.05 lb SO2/hr 0.23 TPY SO2 1.48 OC/hr 6.48 TPY OC 1.02 lbNOx/hr 4.46 TPY NOx	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B041	4.49 lb CO/hr 19.66 TPY CO		ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the



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 Honda R & D North America Inc.  
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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													emissions unit. If required, testing may be required to demonstrate compliance.
B013, B014, B015, B035, B036, B037, B042	0.34 lb PE/hr 1.48 TPY PE 0.32 lb SO2/hr 1.40 TPY SO2	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B013, B014, B015, B035, B036, B037, B042	4.49 OC/hr 19.64 TPY OC 3.60 lbNOx/hr 15.77 TPY NOx 7.04 lb CO/hr 30.85 TPY CO		ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B027, B031, B032, B033	0.39 lb PE/hr 1.70 TPY PE 0.32 lb SO2/hr 1.40 TPY SO2	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate compliance.
B027, B031, B032, B033	4.49 OC/hr 19.64 TPY OC 6.12 lbNOx/hr 26.80 TPY NOx 7.04 lb CO/hr 30.85 TPY CO		ORC 3704.03(T)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit based on the combustion of gasoline in the emissions unit. If required, testing may be required to demonstrate



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
													compliance.
F001	3.43 TPY PM10 10 TPY PM10	31-05(A)(3)		N	N	Y	N	Y	Y	N	N	N	ET: Compliance based on employing best available control measures to control PM10 emissions.
K001, K002, K004	10 gal/day of coating when coating metal parts	21-09(U)(2)(e)(iii) and 31-05(A)(3)		N	N	Y	N	Y	Y	N	N	N	ET: Compliance determined through recordkeeping.
K001, K002	40 lb OC/day	31-05(A)(3)		N	N	Y	N	Y	Y	N	N	N	ET: Compliance determined through recordkeeping of usage and material OC content
K004	7.26 TPY OC from coatings and cleanup material; 2.41 TPY PE from overspray; 0.12 lbNOx/hr 0.53 TPY NOx 0.10 lb CO/hr 0.44 TPY CO 0.002 lb PE/hr 0.01 TPY PE 0.007 lb VOC/hr 0.03 TPY VOC from oven	31-05(A)(3)		N	N	Y	N	Y	N	N	N	N	Rp, ET: Compliance with annual OC and PE limitations determined through annual emissions reporting based on facility recordkeeping of usage and material OC and PE content.  M, R, Rp, ET: The hourly and annual emissions limitations from the oven were established to reflect the potential to emit based on the combustion of natural gas. If required, testing may be required to demonstrate compliance.
K005	10 gal/day of coating when coating metal parts	21-09(U)(2)(e)(iii)		N	N	Y	N	Y	Y	N	N	N	ET: Compliance determined through recordkeeping.



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 Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
K005	2.16 lb VOC/hr 9.45 TPY VOC 0.004 lb PE/hr 0.015 TPY PE	31-05(A)(3)		N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emissions limitations were established to reflect the potential to emit as vented to the waterwash and dry particulate filtration system. If required, testing may be required to demonstrate compliance.
P005, P006	2.80 TPY OC 0.165 lbNOx/hr 0.723 TPY NOx	31-05(A)(3)		N	N	Y	N	Y	N	N	N	N	<p>Rp, ET: Compliance with annual OC limitation determined through annual emissions reporting based on facility recordkeeping of usage and material OC content.</p> <p>M, R, Rp, ET: The hourly and annual NOx emissions limitations were established to reflect the potential to emit. If required, testing may be required to demonstrate compliance.</p>



**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
Honda R & D North America Inc.**

Facility ID:	0180000156
Permit Number:	P0116589
Permit Type:	Renewal
Issued:	4/11/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Honda R & D North America Inc.

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**Draft Title V Permit**  
Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0180000156  
Facility Description: Car and body engines - testing laboratory  
Application Number(s): A0014334, A0014335, A0014336, A0014337, A0038288, A0044271, A0046895, A0050034  
Permit Number: P0116589  
Permit Description: Title V renewal permit for car and body engines - testing laboratory  
Permit Type: Renewal  
Issue Date: 4/11/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0083891

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Honda R & D North America Inc.  
21001 St. Rt. 739  
Raymond, OH 43067

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

**2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- 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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Central District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Central District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*



#### **4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. 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 reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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.



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- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - (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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Central District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



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Honda R & D North America Inc.

**Permit Number:** P0116589

**Facility ID:** 0180000156

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

**30. Submitting Documents Required by this Permit**

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 Ohio EPA DAPC, Central District Office, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Draft Title V Permit**  
Honda R & D North America Inc.  
**Permit Number:** P0116589  
**Facility ID:** 0180000156  
**Effective Date:** To be entered upon final issuance

## **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) None.

2. In accordance with OAC rule 3745-31-05(D) to avoid PSD, the emissions of carbon monoxide (CO) from all emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 249 tons per rolling, 12-month period.

[OAC rule 3745-31-05(D)]

3. In accordance with OAC rule 3745-31-05(D) to avoid MACT, the emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.

[OAC rule 3745-31-05(D)]

#### 4. Operational Restrictions

a) The facility-wide usage of gasoline in the uncontrolled dynamometers shall not exceed 100,000 gallons per rolling, 12-month period.

b) The facility-wide usage of gasoline in controlled dynamometers shall not exceed 540,000 gallons per rolling, 12-month period.

c) The facility-wide natural gas usage shall not exceed 250 million cubic feet per rolling, 12-month period.

d) Emissions from emissions units B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054 shall be vented to a regenerative thermal oxidizer (RTO) with a minimum CO destruction removal efficiency (DRE) of 98%.

e) The usage of coatings in emissions units K001, K002, K004 and K005 shall not exceed 2,275 gallons per rolling, 12-month period.

f) The usage of cleanup materials in emissions units K001, K002, K004 and K005 shall not exceed 750 gallons per rolling, 12-month period.

[OAC rule 3745-31-05(D)]

5. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO(s), for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.



[OAC rule 3745-77-07(C)(1)]

6. The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a) all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b) a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1)]

7. Whenever the monitored average combustion temperature within the RTO deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a) the date and time the deviation began;
  - b) the magnitude of the deviation at that time;
  - c) the date the investigation was conducted;
  - d) the name(s) of the personnel who conducted the investigation; and
  - e) the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f) a description of the corrective action;
- g) the date corrective action was completed;
- h) the date and time the deviation ended;



- i) the total period of time (in minutes) during which there was a deviation;
- j) the temperature readings immediately after the corrective action was implemented; and
- k) the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a modification.

[OAC rule 3745-77-07(C)(1)]

8. The permittee shall maintain monthly records of the following information:
- a) the facility-wide usage of gasoline in the uncontrolled dynamometers, in gallons per month;
  - b) the facility-wide usage of gasoline in the controlled dynamometers, in gallons per month;
  - c) the facility-wide natural gas usage, in million cubic feet;
  - d) the total gallons of coating employed in emissions units K001, K002, K004 and K005;
  - e) the total gallons of cleanup material employed in emissions units K001, K002, K004 and K005;
  - f) the facility-wide CO emissions, in tons per month;
  - g) the facility-wide individual HAP emissions, in tons per month;
  - h) the facility-wide combined HAPs emissions, in tons per month;
  - i) the rolling, 12-month summation of facility-wide gasoline usage in the uncontrolled dynamometers, in gallons;
  - j) the rolling, 12-month summation of facility-wide gasoline usage in the controlled dynamometers, in gallons;
  - k) the rolling, 12-month summation of facility-wide natural gas usage, in million cubic feet;
  - l) the rolling, 12-month summation of the total gallons of coating employed in emissions units K001, K002, K004 and K005;
  - m) the rolling, 12-month summation of the total gallons of cleanup material employed in emissions units K001, K002, K004 and K005;



- n) the rolling, 12-month summation of facility-wide CO emissions, in tons;
- o) the rolling, 12-month summation of facility-wide individual HAP emissions, in tons; and
- p) the rolling, 12-month summation of facility-wide combined HAPs emissions, in tons.

[OAC rule 3745-77-07(C)(1)]

9. The permittee shall submit quarterly deviation (excursion) reports that identify:

- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
  - (1) each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - (2) any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - (3) each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - (4) each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken;
  - (5) each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s);
  - (6) all exceedances of the rolling, 12-month facility-wide limitation of gasoline usage in the uncontrolled dynamometers;
  - (7) all exceedances of the the rolling, 12-month facility-wide limitation of gasoline usage in the controlled dynamometers;
  - (8) all exceedances of the rolling, 12-month facility-wide natural gas usage limitation;
  - (9) all exceedances of the rolling, 12-month coating usage limitation for emissions units K001, K002, K004 and K005;
  - (10) all exceedances of the rolling, 12-month cleanup material usage limitation for emissions units K001, K002, K004 and K005;
  - (11) all exceedances of the rolling, 12-month facility-wide CO emissions limitation;
  - (12) all exceedances of the rolling, 12-month individual HAP emission limitation; and
  - (13) all exceedances of the rolling, 12-month combined HAPs emission limitation.



- b) the probable cause of each deviation (excursion).
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA, Central District Office).

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- 10. Compliance with the rolling, 12-month CO emissions limitation specified in section B.2 of these terms and conditions shall be determined in accordance with the recordkeeping requirements of section B.8.

[OAC rule 3745-77-07(C)(1)]

- 11. Compliance with the rolling, 12-month HAP emissions limitations specified in section B.3 of these terms and conditions shall be determined in accordance with the recordkeeping requirements of section B.8.

[OAC rule 3745-77-07(C)(1)]

- 12. The permittee shall conduct, or have conducted, emission testing for emissions units B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054 in accordance with the following requirements:

- a) Destruction efficiency testing shall be performed at least every five (5) years to confirm that it meets the minimum destruction efficiency identified in B.4.d).
- b) The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- c) The test shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limit, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- d) Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating



parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test.

- e) Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit.
- f) A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[OAC rule 3745-77-07(C)(1)]

- 13. The following emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc: B001, B005, B006, and B011. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Central District Office.

[OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart Dc]

- 14. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ: B007, B008, B043 and B044. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Central District Office.

[OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart ZZZZ]

- 15. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63, Subpart CCCCCC, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Dispensing Facilities Area Sources. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Ohio EPA, Central District Office.

[OAC rule 3745-77-07(A)(13) and 40 CFR Part 63, Subpart CCCCCC]

- 16. The Ohio EPA, Central District Office has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units B013, B014, B015, B019, B027, B031, B032, B033, B035, B036, B037, B042, B052, B053 and B054. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

[40 CFR Part 64]



17. The following insignificant emissions units at this facility must comply with all applicable state and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

- B001 10.48 MMBtu/hr Natural Gas Boiler (PTI 01-2716 and 40 CFR Part 60, Subpart Dc)
- B007 Emergency generator - 1232 HP – diesel (PBR 10539 and 40 CFR Part 63, Subpart ZZZZ)
- B008 Emergency water pump - 121 HP - distillate oil (PBR 10529 and 40 CFR part 63, Subpart ZZZZ)
- B012 High Temperature Dynamometer, Bldg. 7 Room 116
- B017 Emissions Dynamometer, Bldg. 5 Room 126
- B021 Hot/Cold Chamber Dynamometer (HCC), Bldg. 7 Room 119
- B022 4 Wheel Drive Dynamometer, Bldg. 7 Room 110
- B023 Emissions Dynamometer, Bldg. 5 Room 135
- B024 T/S Chassis Dynamometer, 400 HP, Bldg. 7 Room 137
- B025 Dark Room Dynamometer, 300 HP, Bldg. 7 Room 142
- B026 Motorcycle and ATV engine testing dynamometer, Bldg. 8 Room 199
- B028 Engine dynamometer with one movable axle, Bldg. 5 Room 136
- B030 High Temperature Dynamometer, Bldg. 7 Room 155
- B034 Emissions IV Dynamometer, Bldg. 5 Room 139
- B043 Emergency generator - 250 KW - distillate oil (PBR 07292 and 40 CFR Part 63, Subpart ZZZZ)
- B044 Emergency generator - 1400 HP – diesel (PBR 10547 and 40 CFR Part 63, Subpart ZZZZ)
- B045 7.0 MMBtu/hr Natural Gas Boiler
- B046 4.4 MMBtu/hr Natural Gas Boiler
- B047 Full Body ATV Dynamometer, Bldg. 8 Room 197
- B049 Motorcycle Test Chamber Area at Bldg. 8
- B055 ATV and motorcycle dynamometer, Bldg. 8 Room 199C
- G001 Gasoline Tanks/Dispensing Facility Car Wash & Bldg. 5
- G002 Bldg. 13 Fuel Dispensing
- G003 Bldg. 8 Fuel Dispensing
- L001 Cold Cleaners
- P007 Sandblast Unit- Weld Bldg. 4

[OAC rule 3745-77-07(A)(13)]



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



**1. Emissions Unit Group -Natural Gas Boilers: B005 and B006**

EU ID	Operations, Property and/or Equipment Description
B005	12.5 MMBtu/hr natural gas boiler
B006	12.5 MMBtu/hr natural gas boiler

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) (PTI 01-3914)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3475-17-07(A), 3745-17-10(B)(1) and 40 CFR Part 60 Subpart Dc.
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
e.	40 CFR Part 60, Subpart Dc	See c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart Dc]



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

- (2) The permittee shall comply with the applicable recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart Dc.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 69, Subpart Dc]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.



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Applicable Compliance Method

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10<sup>6</sup>scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10<sup>6</sup>scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**2. B011, 12.5 MMBtu/hr Natural Gas Boiler**

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

12.5 MMBtu/hr Natural Gas Boiler

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) (PTI P0116119)	<p>Particulate emissions (PE) shall not exceed 0.02 pound per hour.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.01 pound per hour.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.22 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.03 pounds per hour.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1) and 40 CFR Part 60, Subpart Dc.</p> <p>See b)(2)a. below.</p>
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 60, Subpart Dc	See c)(1) below.

(2) Additional Terms and Conditions

a. The hourly PE, SO<sub>2</sub>, NO<sub>x</sub> and CO emission limitations reflect the emission unit's potential to emit for these pollutants. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart Dc]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit in accordance with 40 CFR 60.48c(g).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 69, Subpart Dc]

e) Reporting Requirements

(1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

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

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10<sup>6</sup>scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10<sup>6</sup>scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Particulate emissions (PE) shall not exceed 0.02 pound per hour.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.01 pound per hour.

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.22 pounds per hour.

Carbon monoxide (CO) emissions shall not exceed 1.03 pounds per hour.

Applicable Compliance Method

These emission limitations were determined by multiplying the maximum natural gas usage in this emissions unit by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1 and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60,



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Appendix A, Methods 1 through 4 and 5 for particulates, 6C for sulfur dioxide, 7E for nitrogen oxides and 10 for carbon monoxide. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**3. B018, EAC #1 Dynamometer**

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

Gasoline Engine Testing Dynamometer (EAC 1), Bldg. 7 Room 123

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) (PTI 01-08447)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.30 ton per year.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.053 pound per hour and 0.232 ton per year.</p> <p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 1.02 pounds per hour and 4.46 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 2.18 pounds per hour and 9.55 tons per year.</p> <p>Carbon monoxide (CO) emissions shall</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 9.82 pounds per hour and 43.0 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3475-17-07(A).</p> <p>See b)(2)a. below.</p>
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO<sub>2</sub>, NO<sub>x</sub>, OC and CO emission limitations from the combustion of gasoline reflect the emission unit's potential to emit for these pollutants. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.
- b. The internal combustion engines used in association with this emissions unit have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and the weather conditions allow, for any visible particulate emissions from all stacks serving this emissions unit. At a minimum, the visible particulate emissions from this emissions unit shall be checked on a quarterly basis unless the emissions unit does not operate during the calendar quarter. The facility shall maintain records showing the operation time(s) of the emissions unit during each calendar quarter. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and



- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly/quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA, Central District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

[OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the director (the Ohio EPA, Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(A)(3)(c)]



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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Particulate emissions (PE) shall not exceed 0.07 pound per hour and 0.30 ton per year.

Applicable Compliance Method

The hourly PE limitation was established by multiplying an emission factor of 0.0025 pound of particulates per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (22 gal/hr) and adding a 20% safety factor [(0.0025 lb PE/gal x 22 gal/hr) + (20% x 0.0025 lb PE/gal x 22 gal/hr)]. The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual PE limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.



If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.053 pound per hour and 0.232 ton per year.

Applicable Compliance Method

The hourly SO<sub>2</sub> emission limitation was established by multiplying an emission factor 5.31 pounds of SO<sub>2</sub> per 1,000 gallons of gasoline burned by the emissions unit's original gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

Compliance with the hourly emission limitation may be demonstrated by multiplying an emission factor of 0.0001 pound of SO<sub>2</sub> per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (22 gal/hr). The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual SO<sub>2</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly SO<sub>2</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 1.02 pounds per hour and 4.46 tons per year.

Applicable Compliance Method

The hourly NO<sub>x</sub> emission limitation was established by multiplying an emission factor 102 pounds of NO<sub>x</sub> per 1,000 gallons of gasoline burned by the emissions unit's original gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

Compliance with the hourly emission limitation may be demonstrated by multiplying an emission factor of 0.003 pound of NO<sub>x</sub> per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (22 gal/hr). The



emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual NO<sub>x</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly NO<sub>x</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitation

Organic compound (OC) emissions shall not exceed 2.18 pounds per hour and 9.55 tons per year.

Applicable Compliance Method

The hourly OC limitation was established by multiplying an emission factor of 0.0825 pound of OC per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (22 gal/hr) and adding a 20% safety factor [(0.0825 lb OC/gal x 22 gal/hr) + (20% x 0.0825 lb OC/gal x 22 gal/hr)]. The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual OC limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly OC limitation.

If required, the permittee shall demonstrate compliance with the hourly OC emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

g. Emission Limitation

Carbon monoxide (CO) emissions shall not exceed 9.82 pounds per hour and 43.0 tons per year.

Applicable Compliance Method

The hourly CO limitation was established by multiplying an emission factor of 0.372 pound of CO per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (22 gal/hr) and adding a 20% safety factor [(0.372 lb CO/gal x 22 gal/hr) + (20% x 0.372 lb CO/gal x 22 gal/hr)]. The emission



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factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual CO limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly CO limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**4. B019, Performance Dynamometer**

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

Performance Dynamometer, Bldg. 5 Room 100A

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) (PTI P0115702)	<p>Best available technology (BAT) for NO<sub>x</sub> has been established as the following:</p> <p>The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month period.</p> <p>BAT for CO has been established as the following:</p> <p>The permittee shall install a regenerative thermal oxidizer (RTO) with a design carbon monoxide control efficiency of at least 98%.</p> <p>See b)(2)c. below.</p>
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 and ORC 3704.03(T) (PTI P0115702)	<p>BAT for PM<sub>10</sub>, PM<sub>2.5</sub> and SO<sub>2</sub> has been established as the following:</p> <p>The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>period.</p> <p>BAT for VOC has been established as the following:</p> <p>The permittee shall install a regenerative thermal oxidizer (RTO) with a design volatile organic compound (VOC) control efficiency of at least 98%.</p> <p>See b)(2)a. and b)(2)c. below.</p>
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 and ORC 3704.03(T)	See b)(2)b. below.
f.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
g.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(4) through d)(9) and e)(2) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate and SO<sub>2</sub> emissions from this air contaminant source since the potentials to emit are less than 10 tons per year.



- ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year as vented to the RTO.
- c. The annual gasoline throughput limitation was established to reflect the maximum potential throughput for this emissions unit. It is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with this limitation.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall properly install, operate and maintain the RTO in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).  
[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]
  - (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, and/or operating manual(s) for the RTO. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.  
[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]
  - (3) The permittee shall maintain the following information for maintenance and repairs performed on the RTO:
    - a. the date of the maintenance and/or repair;
    - b. a description of the maintenance and/or repairs performed; and
    - c. the name of person(s) who performed the maintenance and/or repair.[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]
  - (4) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer (RTO) controlling CO, OC and VOC emissions from this emissions unit has been developed for the monitoring of the combustion zone temperature. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(2) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the RTO's combustion zone temperature indicator range, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance



with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1\%$  of the temperature being measured or  $\pm 5^\circ$  F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the pressure across the process fan. The CAM performance indicator, and indicator range, for the pressure across the process fan is specified in d)(5) below. When the pressure across the process fan is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.



Upon detecting an excursion of the pressure across the process fan measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

- a. Install, calibrate, maintain and operate a differential pressure switch to continuously monitor the pressure across the process fan.

The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) The pressure across the process fan shall not be less than 1.0 inch of water.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (9) Whenever the monitored average combustion temperature within the RTO or the pressure across the process fan deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. each period of time (start time and date, and end time and date) when the pressure across the capture system process fan was outside of the acceptable range;
  - c. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;
  - e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and



- f. each incident of deviation described in “a” through “c” where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-15-03(B)(1)(a); OAC rule 3745-15-03(C); OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month period.

Applicable Compliance Method

The annual gasoline usage limitation was established by multiplying the emission unit's maximum hourly gasoline usage rate (60 gal/hr) by 8,760 hr/yr.



[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

The permittee shall install a regenerative thermal oxidizer (RTO) with a design carbon monoxide control efficiency of at least 98%.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

The permittee shall install a regenerative thermal oxidizer (RTO) with a design volatile organic compound (VOC) control efficiency of at least 98%(as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**5. B040, NVH Dynamometer, Bldg. 13 Room 115**

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

Building 13 NVH Dynamometer

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116119)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.43 ton per year.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.18 pound per hour and 0.77 ton per year.  See b)(2)a. and b)(2)b. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c. below.
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
f.	ORC 3704.03(T) (PTI P0116119)	Emissions from the combustion of gasoline in this emissions unit shall not



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>exceed the following limitations:</p> <p>Organic compound (OC) emissions shall not exceed 3.27 pounds per hour and 14.31 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 3.37 pounds per hour and 14.74 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 14.73 pounds per hour and 64.52 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(5) and 3745-31-05(D).</p> <p>See b)(2)a. below.</p>

(2) Additional Terms and Conditions

- a. The PE, SO<sub>2</sub>, OC, NOx and CO emission limitations from the combustion of gasoline reflect the emission unit's potential to emit for these pollutants. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:



- i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and SO<sub>2</sub> emissions from this air contaminant source since the potentials to emit are less than 10 tons per year.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform quarterly checks, when the emissions unit is in operation and the weather conditions allow, for any visible particulate emissions from all stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(A)(3)]

- e) Reporting Requirements
  - (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]



- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the director (the Ohio EPA, Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(A)(3)(c)]

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

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Particulate emissions (PE) shall not exceed 0.10 pound per hour and 0.43 ton per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).



Applicable Compliance Method

The hourly PE limitation was established by multiplying an emission factor of 3 pounds of PE per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (33 gal/hr). The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001 and includes a 20% safety factor.

The annual PE limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.18 pound per hour and 0.77 ton per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly SO<sub>2</sub> emission limitation was established by multiplying an emission factor 5.31 pounds of SO<sub>2</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (33 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual SO<sub>2</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly SO<sub>2</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

Organic compound (OC) emissions shall not exceed 3.27 pounds per hour and 14.31 tons per year.

Applicable Compliance Method

The hourly OC emission limitation was established by multiplying an emission factor 99 pounds of OC per 1,000 gallons of gasoline burned by the emissions



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unit's maximum gasoline usage rate (33 gal/hr). The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001 and includes a 20% safety factor.

The annual OC limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly OC limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitation

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 3.37 pounds per hour and 14.74 tons per year.

Applicable Compliance Method

The hourly NO<sub>x</sub> emission limitation was established by multiplying an emission factor 102 pounds of NO<sub>x</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (33 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual NO<sub>x</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly NO<sub>x</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

[OAC rule 3745-77-07(C)(1)]

g. Emission Limitation

Carbon monoxide (CO) emissions shall not exceed 14.73 pounds per hour and 64.52 tons per year.

Applicable Compliance Method

The hourly CO emission limitation was established by multiplying an emission factor 446.4 pounds of CO per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (33 gal/hr). The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001 and includes a 20% safety factor.



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The annual CO limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly CO limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**6. B041, Transient Dynamometer, Bldg. 13 Room 117**

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

Building 13 - Transient Dynamometer

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116119)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Particulate emissions (PE) shall not exceed 0.06 pound per hour and 0.28 ton per year.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.05 pound per hour and 0.23 ton per year.</p> <p>Organic compound (OC) emissions shall not exceed 1.48 pounds per hour and 6.48 tons per year.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.02 pounds per hour and 4.46 tons per year.</p> <p>See b)(2)a. and b)(2)b. below.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c. below.
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
f.	ORC 3704.03(T) (PTI P0116119)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Carbon monoxide (CO) emissions shall not exceed 4.49 pounds per hour and 19.66 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(5) and 3745-31-05(D).</p> <p>See b)(2)a. below.</p>

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO<sub>2</sub>, OC, NO<sub>x</sub> and CO emissions limitations were established to reflect the potential to emit for each pollutant. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:



- i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO<sub>2</sub>, OC and NO<sub>x</sub> emissions from this air contaminant source since the potentials to emit are less than 10 tons per year.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform quarterly checks, when the emissions unit is in operation and the weather conditions allow, for any visible particulate emissions from all stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(A)(3)]

- e) Reporting Requirements
  - (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]



- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the director (the Ohio EPA, Central District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(A)(3)(c)]

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation

Particulate emissions (PE) shall not exceed 0.06 pound per hour and 0.28 ton per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).



Applicable Compliance Method

The hourly PE emission limitation was established by multiplying an emission factor 6.47 pounds of PE per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual PE limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.05 pound per hour and 0.23 ton per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly SO<sub>2</sub> emission limitation was established by multiplying an emission factor 5.31 pounds of SO<sub>2</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual SO<sub>2</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly SO<sub>2</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6.

[OAC rule 3745-77-07(C)(1)]

e. Emissions Limitation

Organic compound (OC) emissions shall not exceed 1.48 pounds per hour and 6.48 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).



Applicable Compliance Method

The hourly OC emission limitation was established by multiplying an emission factor 148 pounds of OC per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual OC limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly OC limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

f. Emissions Limitation

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.02 pounds per hour and 4.46 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly NO<sub>x</sub> emission limitation was established by multiplying an emission factor 102 pounds of NO<sub>x</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (10 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual NO<sub>x</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly NO<sub>x</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

[OAC rule 3745-77-07(C)(1)]

g. Emissions Limitation

Carbon monoxide (CO) emissions shall not exceed 4.49 pounds per hour and 19.66 tons per year.



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The hourly CO limitation was established by multiplying an emission factor of 0.374 pound of CO per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (10 gal/hr) and adding a 20% safety factor [(0.374 lb CO/gal x 10 gal/hr) + (20% x 0.374 lb CO/gal x 10 gal/hr)]. The emission factor was established using emission test data from a similar emissions unit tested on June 4, 2001.

The annual CO limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly CO limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**7. Emissions Unit Group -Dynamometers: B013, B014, B015, B035, B036, B037, B042**

EU ID	Operations, Property and/or Equipment Description
B013	Performance Dynamometer, engine testing w/ incinerator control, Bldg. 5 Room 101
B014	Performance Dynamometer, engine testing w/ incinerator control, Bldg. 13 Room 120
B015	Durability Dynamometer, engine testing w/ incinerator control, Bldg. 5 Room 105
B035	Transmission Dynamometer 1, Bldg 14. Room 101
B036	Transmission Dynamometer 2, Bldg. 14 Room 102
B037	Transmission Dynamometer 3, Bldg. 14 Room 103
B042	Performance Dynamometer controlled by thermal incinerator, Bldg. 5 Room 107

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116119)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  Particulate emissions (PE) shall not exceed 0.34 pound per hour and 1.48 tons per year.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.32 pound per hour and 1.40 tons per year.  See b)(2)a. and b)(2)b. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii),	See b)(2)c. below.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	as effective 12/01/06	
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
f.	ORC 3704.03(T) (PTI P0116119)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Organic compound (OC) emissions shall not exceed 4.49 pounds per hour and 19.64 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 3.60 pounds per hour and 15.77 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 7.04 pounds per hour and 30.85 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(5) and 3745-31-05(D).</p> <p>See b)(2)a. below.</p>
g.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6) and e)(2) below.

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO<sub>2</sub>, OC, NO<sub>x</sub> and CO emissions limitations were established to reflect the potential to emit for each pollutant. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy



BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and SO<sub>2</sub> emissions from this air contaminant source since the potentials to emit are less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer (RTO) controlling CO, OC and VOC emissions from this emissions unit has been developed for the monitoring of the combustion zone temperature. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(2) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the RTO's combustion zone temperature indicator range, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1\%$  of the temperature being measured or  $\pm 5^\circ$  F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than  $25^\circ$  F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the pressure across the process fan. The CAM performance indicator, and indicator range, for the pressure across the process fan is specified in d)(5) below. When the pressure across the process fan is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the pressure across the process fan measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

- a. Install, calibrate, maintain and operate a differential pressure switch to continuously monitor the pressure across the process fan.



The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) The pressure across the process fan shall not be less than 1.0 inch of water.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) Whenever the monitored average combustion temperature within the RTO or the pressure across the process fan deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
- b. each period of time (start time and date, and end time and date) when the pressure across the capture system process fan was outside of the acceptable range;
- c. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
- d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;
- e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and
- f. each incident of deviation described in "a" through "c" where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-15-03(B)(1)(a); OAC rule 3745-15-03(C); OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation

Particulate emissions (PE) shall not exceed 0.34 pound per hour and 1.48 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly PE limitation was established by multiplying an emission factor of 0.0047 pound of particulates per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr) and adding a 20% safety factor  $[(0.0047 \text{ lb PE/gal} \times 60 \text{ gal/hr}) + (20\% \times 0.0047 \text{ lb PE/gal} \times 60 \text{ gal/hr})]$ . The emission factor was established using emission test data from a similar emissions unit tested on June 2, 2001.

The annual PE limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]



d. Emissions Limitation

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.32 pound per hour and 1.40 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly SO<sub>2</sub> emission limitation was established by multiplying an emission factor 5.31 pounds of SO<sub>2</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual SO<sub>2</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly SO<sub>2</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6.

[OAC rule 3745-77-07(C)(1)]

e. Emissions Limitation

Organic compound (OC) emissions shall not exceed 4.49 pounds per hour and 19.64 tons per year.

Applicable Compliance Method

The uncontrolled hourly OC emissions were calculated by multiplying an emission factor 148 pounds of OC per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The controlled hourly OC emissions limitation was established as follows.

$OC = (\text{Gasoline Throughput}) \times (EF) \times [(CE) \times (1 - DE) + (1 - CE)]$ , where:

- Gasoline Throughput (maximum) = 60 gal/hr
- EF (emission factor) = 0.148 pound of OC per gallon of gasoline
- CE (capture efficiency) = 99%
- DE (destruction efficiency) = 50%

The annual OC limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly OC limitation.



If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

f. Emissions Limitation

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 3.60 pounds per hour and 15.77 tons per year.

Applicable Compliance Method

The hourly NO<sub>x</sub> limitation was established by multiplying an emission factor of 0.050 pound of NO<sub>x</sub> per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr) and adding a 20% safety factor [(0.050 lbNO<sub>x</sub>/gal x 60 gal/hr) + (20% x 0.050 lbNO<sub>x</sub>/gal x 60 gal/hr)]. The emission factor was established using emission test data from a similar emissions unit tested on June 2, 2001.

The annual NO<sub>x</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly NO<sub>x</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

[OAC rule 3745-77-07(C)(1)]

g. Emissions Limitation

Carbon monoxide (CO) emissions shall not exceed 7.04 pounds per hour and 30.85 tons per year.

Applicable Compliance Method

The uncontrolled hourly CO emissions were calculated by multiplying an emission factor 3,940 pounds of CO per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The controlled hourly CO emissions limitation was established as follows.

$CO = (\text{Gasoline Throughput}) \times (EF) \times [(CE) \times (1 - DE) + (1 - CE)]$ , where:

Gasoline Throughput (maximum) = 60 gal/hr

EF (emission factor) = 3.94 pounds of CO per gallon of gasoline

CE (capture efficiency) = 99%



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DE (destruction efficiency) = 98%

The annual CO limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly CO limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**8. Emissions Unit Group -Dynamometers: B027, B031, B032, B033**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B027	Engine testing dynamometer, Bldg. 5 Room 100B
B031	Durability Dynamometer, Bldg. 13 Room 121 (One AVL Cradle Mounted Dyno With Hydrostatic Option: Model: DynoExact APA 302/10 PO)
B032	Performance Dynamometer, Bldg. 5 Room 103 (One AVL Cradle Mounted Dyno with Hydrostatic Option: Model DynoExact APA 302/10 PO)
B033	Durability Dynamometer, Bldg. 13 Room 122

- 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116119)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Particulate emissions (PE) shall not exceed 0.39 pound per hour and 1.70 tons per year.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.32 pound per hour and 1.40 tons per year.</p> <p>See b)(2)a. and b)(2)b. below.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c. below.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
f.	ORC 3704.03(T) (PTI P0116119)	<p>Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:</p> <p>Organic compound (OC) emissions shall not exceed 4.49 pounds per hour and 19.64 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 6.12 pounds per hour and 26.80 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 7.04 pounds per hour and 30.85 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), OAC rule 3745-17-11(B)(5) and 3745-31-05(D).</p> <p>See b)(2)a. below.</p>
g.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(1) through d)(6) and e)(2) below.

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO<sub>2</sub>, OC, NO<sub>x</sub> and CO emissions limitations were established to reflect the potential to emit for each pollutant. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emission limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and SO<sub>2</sub> emissions from this air contaminant source since the potentials to emit are less than 10 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer (RTO) controlling CO, OC and VOC emissions from this emissions unit has been developed for the monitoring of the combustion zone temperature. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(2) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the RTO's combustion zone temperature indicator range, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1\%$  of the temperature being measured or  $\pm 5^\circ$  F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than  $25^\circ$  F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the pressure across the process fan. The CAM performance indicator, and indicator range, for the pressure across the process fan is specified in d)(5) below. When the pressure across the process fan is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the pressure across the process fan measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

- a. Install, calibrate, maintain and operate a differential pressure switch to continuously monitor the pressure across the process fan.



The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) The pressure across the process fan shall not be less than 1.0 inch of water.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) Whenever the monitored average combustion temperature within the RTO or the pressure across the process fan deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]



e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
- b. each period of time (start time and date, and end time and date) when the pressure across the capture system process fan was outside of the acceptable range;
- c. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
- d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;
- e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and
- f. each incident of deviation described in "a" through "c" where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-15-03(B)(1)(a); OAC rule 3745-15-03(C); OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance is inherent based on the AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.10 lb/MMBtu.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation

Particulate emissions (PE) shall not exceed 0.39 pound per hour and 1.70 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly PE emission limitation was established by multiplying an emission factor 6.47 pounds of PE per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual PE limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.32 pound per hour and 1.40 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).



Applicable Compliance Method

The hourly SO<sub>2</sub> emission limitation was established by multiplying an emission factor 5.31 pounds of SO<sub>2</sub> per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual SO<sub>2</sub> limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly SO<sub>2</sub> limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6.

[OAC rule 3745-77-07(C)(1)]

e. Emissions Limitation

Organic compound (OC) emissions shall not exceed 4.49 pounds per hour and 19.64 tons per year.

Applicable Compliance Method

The uncontrolled hourly OC emissions were calculated by multiplying an emission factor 148 pounds of OC per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The controlled hourly OC emissions limitation was established as follows.

OC = (Gasoline Throughput) x (EF) x [(CE) x (1 - DE) + (1 - CE)], where:

Gasoline Throughput (maximum) = 60 gal/hr

EF (emission factor) = 0.148 pound of OC per gallon of gasoline

CE (capture efficiency) = 99%

DE (destruction efficiency) = 50%

The annual OC limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly OC limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]



f. Emissions Limitation

Nitrogen oxides (NOx) emissions shall not exceed 6.12 pounds per hour and 26.80 tons per year.

Applicable Compliance Method

The hourly NOx emission limitation was established by multiplying an emission factor 102 pounds of NOx per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The annual NOx limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly NOx limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

[OAC rule 3745-77-07(C)(1)]

g. Emissions Limitation

Carbon monoxide (CO) emissions shall not exceed 7.04 pounds per hour and 30.85 tons per year.

Applicable Compliance Method

The uncontrolled hourly CO emissions were calculated by multiplying an emission factor 3,940 pounds of CO per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr). The emission factor is specified in U.S. EPA's WebFIRE database (using SCC number 20400401 for reciprocating gasoline engines).

The controlled hourly CO emissions limitation was established as follows.

$CO = (\text{Gasoline Throughput}) \times (EF) \times [(CE) \times (1 - DE) + (1 - CE)]$ , where:

Gasoline Throughput (maximum) = 60 gal/hr

EF (emission factor) = 3.94 pounds of CO per gallon of gasoline

CE (capture efficiency) = 99%

DE (destruction efficiency) = 98%

The annual CO limitation was established by multiplying the hourly emission limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly CO limitation.



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If required, the permittee shall demonstrate compliance with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**9. Emissions Unit Group -Durability Dynamometers: B052,B053,B054**

EU ID	Operations, Property and/or Equipment Description
B052	Durability dynamometer controlled by thermal incinerator, Bldg. 13 Room 123
B053	Durability dynamometer controlled by thermal incinerator, Bldg. 13 Room 124
B054	Durability dynamometer controlled by thermal incinerator, Bldg. 13 Room 126

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)	Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) (PTI P0115703)	Best available technology (BAT) for NOx has been established as the following:  The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month period.  BAT for CO has been established as the following:  The permittee shall install a regenerative thermal oxidizer (RTO) with a design carbon monoxide control efficiency of at least 98%.  See b)(2)c. below.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 and ORC	BAT for PM10, PM2.5 and SO <sub>2</sub> has been established as the following:



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	3704.03(T) (PTI P0115703)	The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month period.  BAT for VOC has been established as the following:  The permittee shall install a regenerative thermal oxidizer (RTO) with a design volatile organic compound (VOC) control efficiency of at least 98%.  See b)(2)a. and b)(2)c. below.
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 and ORC 3704.03(T)	See b)(2)b. below.
f.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
g.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM)	See d)(4) through d)(9) and e)(2) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate and SO<sub>2</sub> emissions from



this air contaminant source since the potentials to emit are less than 10 tons per year.

ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year as vented to the RTO.

c. The annual gasoline throughput limitation was established to reflect the maximum potential throughput for this emissions unit. It is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate and maintain the RTO in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, and/or operating manual(s) for the RTO. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]

(3) The permittee shall maintain the following information for maintenance and repairs performed on the RTO:

a. the date of the maintenance and/or repair;

b. a description of the maintenance and/or repairs performed; and

c. the name of person(s) who performed the maintenance and/or repair.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]

(4) The CAM plan for monitoring the control efficiency of the regenerative thermal oxidizer (RTO) controlling CO and VOC emissions from this emissions unit has been developed for the monitoring of the combustion zone temperature. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(2) below. When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.



Upon detecting an excursion of the RTO's combustion zone temperature indicator range, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1\%$  of the temperature being measured or  $\pm 5^\circ$  F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 25° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (7) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the pressure across the process fan. The CAM performance indicator, and indicator range, for the pressure across the process fan is specified in d)(5) below. When the pressure across the process fan is outside of the indicator range, corrective action (including, but not limited



to, an evaluation of the RTO) will be required. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

Upon detecting an excursion of the pressure across the process fan measurement, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using the following procedures:

- a. Install, calibrate, maintain and operate a differential pressure switch to continuously monitor the pressure across the process fan.

The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (8) The pressure across the process fan shall not be less than 1.0 inch of water.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (9) Whenever the monitored average combustion temperature within the RTO or the pressure across the process fan deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that



determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the RTO was outside of the acceptable range;
  - b. each period of time (start time and date, and end time and date) when the pressure across the capture system process fan was outside of the acceptable range;
  - c. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the RTO;
  - d. each incident of deviation described in "a" through "c" (above) where a prompt investigation was not conducted;
  - e. each incident of deviation described in "a" through "c" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the



temperature within the RTO into compliance with the acceptable range, was determined to be necessary and was not taken; and

- f. each incident of deviation described in “a” through “c” where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-15-03(B)(1)(a); OAC rule 3745-15-03(C); OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

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

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation

Particulate emissions shall not exceed 0.310 pound per million Btu of actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the emission factor of 0.10 pound of PM<sub>10</sub> per million Btu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

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).

[OAC rule 3745-77-07(C)(1)]



c. Emission Limitation

The usage of gasoline shall not exceed 525,600 gallons per rolling, 12-month period.

Applicable Compliance Method

The annual gasoline usage limitation was established by multiplying the emission unit's maximum hourly gasoline usage rate (60 gal/hr) by 8,760 hr/yr.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

The permittee shall install a regenerative thermal oxidizer (RTO) with a design carbon monoxide control efficiency of at least 98%.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

The permittee shall install a regenerative thermal oxidizer (RTO) with a design volatile organic compound (VOC) control efficiency of at least 98% (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



**10. F001, Paved and Unpaved Roadways and Parking Areas**

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

Paved Roadways and Parking Areas: HRA 1, HRA 2, HRA 3, HRA 4, HRA 5, HRA 6, HRA 7, HRA 8, HRA 9, HRA 10, HRA 11 and HRA 13

Unpaved Roadways and Parking Areas: HRA 6 (gravel) and HRA 12 (gravel)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0109996)	Particulate emissions (PM10) shall not exceed 3.43 tons per year.  See b)(2)a. and b)(2)c. through b)(2)g. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	Particulate emissions (PM10) shall not exceed 10 tons per year.  See b)(2)b. through b)(2)g. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



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- b. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The permittee has agreed to the following voluntary restrictions for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

To employ the best available control measures on all paved and unpaved roadways and parking areas as specified in b)(2)c. through b)(2)g. of these terms and conditions to ensure controlled potential PM10 emissions are less than 10 tons per year.
- 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 application, the permittee has committed to treat the paved roadways and parking areas by sweeping and/or water flushing at sufficient treatment 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 all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the unpaved roadways and parking areas by watering 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 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 unpaved roadways and parking areas that are 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.
- f. 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.
- g. 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.

c) Operational Restrictions

- (1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
HRA 1 Main Access	Weekly
HRA 2 Facility Loop Access Road	Daily during deposition from onsite construction and otherwise monthly
HRA 3 East Lot Drive & Parking	Monthly
HRA 4 West Lot Drive & Parking	Monthly
HRA 5 Facilities Access & Parking	Monthly
HRA 6 Recreation Center	Monthly
HRA 7 Building 7 Lot/Backloop	Monthly
HRA 8 Building 13/14 Parking	Monthly
HRA 9 TRC Access/Loading Dock	Monthly
HRA 10 Gasoline Station	Monthly
HRA 11 Test Track	Monthly
HRA 13 MC Parking	Monthly

<u>unpaved roadways and parking areas</u>	<u>minimum inspection frequency</u>
HRA 6 Recreation Center	Weekly*
HRA 12 Construction Road/Parking	Weekly*

\*In the event that HRA 6 or HRA 12 is paved, the minimum inspection frequency requirement will change to monthly.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)]

- (2) 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 conditions. 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.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)]

- (3) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections 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 measures.

The information required in d)(3)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit deviation 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.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

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 (PM10) shall not exceed 3.43 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

- a. Applicable Compliance Method

Compliance shall be determined by summing the emissions from each paved and unpaved roadway and parking area segment using the following procedures for each segment.



The annual PM10 emissions from each paved roadway and parking area segment shall be determined by multiplying the emission factor, E, by the total annual vehicle miles traveled (VMT) and the assumed control efficiency for sweeping and water flushing of 80% (1-0.8) for paved surfaces from Table 2.1.1-3 of RACM (Reasonably Available Control Measures for Fugitive Dust Sources-9/80) and then dividing by 2,000 lb/ton. The emission factor, E, shall be determined by the following equation found in AP-42 Section 13.2.1.3 for paved roads (January 2011).

$E = k(sL)^{0.91}(W)^{1.02}(1-P/4N)$ , where:

E = PM10 emission factor (lb/VMT)

k = 0.0022 lb/VMT (AP-42 Table 13.2.1-1)

sL = 0.6 g/m<sup>2</sup> (AP-42 Table 13.2.1-2)

W = mean vehicle weight (tons)

P = 120 days (AP-42 Figure 13.2.1-2)

N = 365 days/year

The annual PM10 emissions from each unpaved roadway and parking area segment shall be determined by multiplying the emission factor, E, by the total annual vehicle miles traveled (VMT) and the assumed control efficiency for watering of 50% (1-0.5) for unpaved surfaces from Table 2.1.1-3 of RACM (Reasonably Available Control Measures for Fugitive Dust Sources- 9/80) and then dividing by 2,000 lb/ton. The emission factor, E, shall be determined by the following equation found in AP-42 Section 13.2.2.2 for unpaved roads (November 2006).

$E = k(s/12)^a(W/3)^b[(365-P)/365]$ , where:

E = PM10 emission factor (lb/VMT)

k = 1.5 lb/VMT (AP-42 Table 13.2.2-2)

s = 6% (AP-42 Table 13.2.2-1)

a = 0.9 (AP-42 Table 13.2.2-2)

W = mean vehicle weight (tons)

b = 0.45 (AP-42 Table 13.2.2-2)

P = 120 days (AP-42 Figure 13.2.2-1)

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation

Particulate emissions (PM10) shall not exceed 10 tons per year (as applicable after U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

Compliance shall be determined by using the emission factor equations in AP-42 Section 13.2.1 for paved roads and Section 13.2.2 for unpaved roads.



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[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**11. Emissions Unit Group -Spray Booths: K001 and K002**

EU ID	Operations, Property and/or Equipment Description
K001	Preparation Surface Coating Booth
K002	Surface Coating Test Booth

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 3745-17-11(C)	See c)(1) and c)(2) below.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3) (PTI P0116119)	When coating non-metal parts, organic compound (OC) emissions shall not exceed 40 pounds per day.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C) and 3745-21-09(U)(2)(e)(iii).  See b)(2)b. below.
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

b. For purposes of calculating the OC emissions from this emissions unit, the permittee shall utilize a value of 73% as the maximum percentage of the OC employed in this emissions unit that are emitted from the emissions unit. The remaining 27% of the OC employed in the spray booth shall be considered to be the emissions for the oven associated with this emissions unit. This “split” of OC



emissions between this emissions unit and the associated spray booth is based upon the facility's best engineering estimates.

c) Operational Restrictions

- (1) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;



- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall collect and record the following information each day when coating metal parts:
  - a. the name and identification number of each coating employed;
  - b. the number of gallons of each coating employed; and
  - c. the total number of gallons of all coatings employed.

[OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall collect and record the following information each day when coating non-metal parts:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC content of each coating and cleanup material employed, in pounds per gallon;
  - d. the total OC emissions from all cleanup materials, in pounds;
  - e. the total potential (prior to applying the booth/oven "split") OC emissions for all coatings employed, in pounds;
  - f. the total potential OC emissions from coating usage in this emissions unit (i.e., e. x 73%), in pounds per day;
  - g. the total OC emissions from all coatings and cleanup materials (i.e., d. + f.), in pounds.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]



e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify the director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
- b. any daily record showing that the organic compounds emissions from the coating of non-metal parts exceeded 40 pounds per day.

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

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

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

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(6).

[OAC rule 3745-77-07(C)(1)]



b. Emission Limitation

When coating non-metal parts, organic compound emissions shall not exceed 40 pounds per day.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(7).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**12. K004, Paint Booth with oven**

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

Test paint spray booth, coating metal and plastic

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) b)(1)g., d)(8), d)(9), d)(10), d)(11) and e)(3)c.

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 3745-17-07(A)	Visible particulate emissions from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input from any indirect-fired oven zone associated with this emissions unit.
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2) below.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
e.	OAC rule 3745-31-05(A)(3) (PTI P0116119)	Organic compound (OC) emissions from coatings and cleanup materials shall not exceed 7.26 tons per year.  Particulate emissions (PE) from overspray shall not exceed 2.41 tons per year.  Emissions from the combustion of natural gas in the oven associated with this emissions unit shall not exceed:  0.12 lb/hr of NO <sub>x</sub> ; 0.53 ton/yr of NO <sub>x</sub> ; 0.10 lb/hr of CO; 0.44 ton/yr of CO; 0.002 lb/hr of PE;



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.01 ton/yr of PE; 0.007 lb/hr of VOC; and 0.03 ton/yr of VOC.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(C) and 3745-21-09(U)(2)(e)(iii).  See b)(2)b. below.
f.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.
g.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See d)(8) through d)(11) below.

(2) Additional Terms and Conditions

- a. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.
- b. The NOx, CO, PE and VOC emission limitations from the combustion of natural reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emissions limitations.

c) Operational Restrictions

- (1) The permittee shall operate the dry particulate filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filtration system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) In the event the dry particulate filtration control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filtration control system, along



with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall conduct periodic inspections of the dry particulate filtration control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filtration control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filtration control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain records that document any time periods when the dry particulate filtration control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filtration control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall collect and record the following information each day when coating metal parts:



- a. the name and identification number of each coating employed;
- b. the number of gallons of each coating employed; and
- c. the total number of gallons of all coatings employed.

[OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(C)(1)]

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

- a. the name and identification of each coating and cleanup material employed;
- b. the OC content of each coating and cleanup material, in pounds per gallon;
- c. the solids content of each coating, as a weight percent;
- d. the density of each coating, in pounds per gallon;
- e. the transfer efficiency of each coating employed;
- f. the dry particulate filtration system control efficiency;
- g. the number of gallons of each coating and cleanup material employed;
- h. the total OC emissions from all coatings and cleanup materials employed;
- i. the calculated PE from coating overspray;
- j. the annual summation of OC emissions from all coatings and cleanup materials employed, in tons; and
- k. the annual summation of PE from coating overspray, in tons.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]

(8) The PTI application for this emissions unit, K004, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been



documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene  
TLV (mg/m<sup>3</sup>): 434  
Maximum Hourly Emission Rate (lb/hr): 11.06  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2,142  
MAGLC (ug/m<sup>3</sup>): 10,333

Toxic Contaminant: styrene  
TLV (mg/m<sup>3</sup>): 85  
Maximum Hourly Emission Rate (lb/hr): 5.30  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,027  
MAGLC (ug/m<sup>3</sup>): 2,024

Toxic Contaminant: formaldehyde  
TLV (mg/m<sup>3</sup>): 0.368  
Maximum Hourly Emission Rate (lb/hr): 0.026  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4.92  
MAGLC (ug/m<sup>3</sup>): 8.76

The permittee, has demonstrated that emissions of xylene, styrene and formaldehyde, from emissions unit(s) K004, are calculated to be less than eighty per cent of the maximum acceptable ground level concentrations (MAGLC); any new raw material or



processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);



- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

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

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify the director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any daily record showing that the dry particulate filtration control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
  - b. any daily record showing that the organic compounds emissions from the coating of non-metal parts exceeded 40 pounds per day; and
  - c. any changes made to a parameter or value entered into the dispersion model that was used to maintain compliance with the "Toxic Air Contaminant Statute",



ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration.

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

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(A)(3)(c), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01], Option A, Engineering Guide #70

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. Emissions Limitation

Visible particulate emissions from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input from any indirect-fired oven zone associated with this emissions unit.

Applicable Compliance Method

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10<sup>6</sup>scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10<sup>6</sup>scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]



c. Emission Limitation

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(6).

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

Organic compound (OC) emissions from coatings and cleanup materials shall not exceed 7.26 tons per year.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(7).

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitation

Particulate emissions (PE) from overspray shall not exceed 2.41 tons per year.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(7).

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitation

Emissions from the combustion of natural gas in the oven associated with this emissions unit shall not exceed:

- 0.12 lb/hr of NO<sub>x</sub>;
- 0.53 ton/yr of NO<sub>x</sub>;
- 0.10 lb/hr of CO;
- 0.44 ton/yr of CO;
- 0.002 lb/hr of PE;
- 0.01 ton/yr of PE;
- 0.007 lb/hr of VOC; and
- 0.03 ton/yr of VOC.



**Draft Title V Permit**

Honda R & D North America Inc.

**Permit Number:** P0116589

**Facility ID:** 0180000156

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

Applicable Compliance Method:

These emission limitations were determined by multiplying the maximum natural gas usage in this emissions unit by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1 and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5 for PE, 7E for nitrogen oxides, 10 for carbon monoxide, and Methods 18, 25, or 25A for VOC. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

[OAC rule 3745-77-07(C)(1)]

- (2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of coatings and cleanup materials.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



**13. K005, Spray Booth**

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

Surface coating of miscellaneous metal and non-metal parts, includes waterwash and particulate filter

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 3745-17-11(C)	See c)(1) and c)(2) below.
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0116119)	<p>Volatile organic compound (VOC) emissions shall not exceed 2.16 pounds per hour and 9.45 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 0.004 pound per hour and 0.015 ton per year.</p> <p>See b)(2)b. through b)(2)d. below.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)e. below.
e.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

b. The hourly and annual VOC emissions limitations were established to reflect the potential to emit for this emissions unit in accordance with the information provided in the PTI application. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emissions limitations.



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- c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the control requirements established under OAC rule 3745-17-11(C) and in accordance with the information provided in the PTI application. The monitoring, recordkeeping, reporting, and testing requirements for the PE control system as established in the following terms and conditions are sufficient to demonstrate compliance with these PE limitations.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.
- e. The following rule paragraphs will apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and VOC emissions for this emissions unit because the uncontrolled potentials to emit are less than 10 tons per year.

c) Operational Restrictions

- (1) The permittee shall operate the waterwash and dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash and dry particulate filter in accordance with the manufacturers' recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) In the event the waterwash control and particulate filter system is not operating in accordance with the manufacturers' recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements



- (1) The permittee shall maintain documentation of the manufacturers' recommendations, instructions, or operating manuals for the waterwash control and dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall conduct periodic inspections of the waterwash control and dry particulate filter to determine whether they are operating in accordance with the manufacturers' recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturers' recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control and dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturers' recommendations.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall document each inspection (periodic and annual) of the waterwash control and dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA, Central District Office upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain records that document any time periods when the waterwash control or dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control or dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C) and OAC rule 3745-77-07(C)(1)]



- (6) The permittee shall collect and record the following information each day when coating metal parts:
- a. the name and identification number of each coating employed;
  - b. the number of gallons of each coating employed; and
  - c. the total number of gallons of all coatings employed.

[OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) 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.

[OAC rule 3745-77-07(A)(3)(c)]

- (2) For any day when coating metal parts, the permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily coating usage restriction of 10 gallons per day for metal parts. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that include any daily record showing that the waterwash control and dry particulate filter system was not in service or not operated according to manufacturers' recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

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

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(6).

[OAC rule 3745-77-07(C)(1)]



b. Emission Limitation

Volatile organic compounds (VOC) emissions shall not exceed 2.16 pounds per hour and 9.45 tons per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly VOC limit was established by the following equation.

$E = \text{maximum coating/cleanup material usage} \times \text{VOC content}$ , where:

$E = \text{volatile organic compounds emissions rate (lb/hr)}$

Maximum coating/cleanup material usage = 0.31 gallons per hour

Maximum VOC content of coatings and cleanup materials = 6.96 pounds per gallon

The annual limitation was calculated by multiplying the hourly limitation by 8,760 hr/yr and then dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly VOC limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25, or 25A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Particulate emissions (PE) shall not exceed 0.004 pound per hour and 0.015 ton per year (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method

The hourly PE limit was established by the following equation.

$E = \text{maximum coating usage} \times \text{coating density} \times \text{solids content} \times (1 - TE) \times (1 - CE_1) \times (1 - CE_2)$ , where:

$E = \text{particulate emissions rate (lb/hr)}$

Maximum coating usage = 0.31 gallons per hour

Maximum density of the coatings = 14 pounds per gallon

Maximum solids content = 78.0% by weight



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TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (35%)

CE<sub>1</sub> = control efficiency of the waterwash (assumed to be 96%)

CE<sub>2</sub> = control efficiency of the particulate filter (assumed to be 96%)

The annual limitation was calculated by multiplying the hourly limitation by 8,760 hr/yr and then dividing by 2,000 lb/ton. Compliance with this emission limitation may be assumed provided the permittee complies with the hourly PE limitation.

If required, the permittee shall demonstrate compliance with this emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-77-07(C)(1)]

- (2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of coatings and cleanup materials.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



**14. Emissions Unit Group -Ovens: P005 and P006**

EU ID	Operations, Property and/or Equipment Description
P005	Preparation Coating Test Oven
P006	Surface Coating Test Oven

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) (PTI P0116119)	Organic compound (OC) emissions shall not exceed 2.80 tons per year.  Nitrogen oxides (NOx) emissions shall not exceed 0.165 pound per hour and 0.723 ton per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B).  See b)(2)a. and b)(2)b. below.
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid PSD and MACT)	See Facility-Wide Terms and Conditions.



(2) Additional Terms and Conditions

- a. For purposes of calculating the OC emissions from this emissions unit, the permittee shall utilize a value of 73% as the maximum percentage of the OC employed in the spray booth that are emitted from the spray booth. The remaining 27% of the OC employed in the spray booth shall be considered to be the emissions for this emissions unit. This “split” of OC emissions between this emissions unit and the associated spray booth is based upon the facility’s best engineering estimates.
- b. The NOx emission limitations reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping or reporting requirements to ensure compliance with these emissions limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the total potential (prior to applying the booth/oven “split”) OC emissions for all coatings employed in the coating operation associated with this emissions unit, in pounds;
- b. the total potential OC emissions from this emissions unit (i.e., a. x 27%), in pounds;and
- c. the annual summation of OC emissions from this emissions unit, in tons.

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(3)(a)(ii)]

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. Emissions Limitation

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emissions Limitation

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 1.9lbPE/10<sup>6</sup>scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10<sup>6</sup>scf natural gas.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-17-03(B)(9) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Organic compound (OC) emissions shall not exceed 2.80 tons per year.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements of d)(1).

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitation

Nitrogen oxides (NO<sub>x</sub>) emissions from natural gas combustion in the oven associated with this emission unit shall not exceed 0.165 pound per hour and 0.723 ton per year.

Applicable Compliance Method

The hourly NO<sub>x</sub> emission limitation was determined by multiplying the maximum natural gas usage in this emissions unit by the emission factor for NO<sub>x</sub> found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Table 1.4-1.



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The annual NOx emission limitation was established by multiplying the hourly limitation by 8,760 hr/yr and dividing by 2,000 lb/ton. Compliance with the annual NOx limitation may be assumed provided the permittee complies with the hourly NOx limitation.

If required, the permittee shall demonstrate compliance with these emission limitations through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 7E.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.