



4/11/2014

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0180000156
Permit Number: P0116119
Permit Type: Administrative Modification
County: Union

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

Dear Permit Holder:

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

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

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

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

Sincerely,


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

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Honda R & D North America Inc.

Issue Date: 4/11/2014
Permit Number: P0116119
Permit Type: Administrative Modification
Permit Description: Administrative modification to adjust BAT to reflect current emissions factors for natural gas combustion; add BAT requirements for less than 10 ton per year pollutants pursuant to Senate Bill 265; add OAC rule 3745-17-07(A) requirements; add facility-wide federally enforceable limitations to avoid MACT and PSD; and update applicable rule citations.
Facility ID: 0180000156
Facility Location: Honda R & D North America Inc.
21001 St. Rt. 739,
Raymond, OH 43067
Facility Description: Testing Laboratories

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Honda R&D North America Inc. (Honda R&D) submitted an administrative modification application requesting a facility-wide federally enforceable limitation to avoid the boiler MACT (40 CFR Part 63, Subpart DDDDD). The limitation includes restricting coating usage to 2,275 gallons per rolling, 12-month period and cleanup usage to 750 gallons per rolling, 12-month period in emissions units K001, K002, K004 and K005.

This permit will also include various administrative modifications that were identified while processing the facility's Title V renewal. A summary of the modifications is provided below.

Facility Emissions and Attainment Status:

Honda R&D is operating under a facility-wide federally enforceable limitation to keep the facility's potential to emit under the 250 ton PSD threshold for carbon monoxide. The limitation includes restricting natural gas consumption to 250,000,000 standard cubic feet per year, usage of gasoline in the uncontrolled dynamometers to 100,000 gallons per year and usage of gasoline in the controlled dynamometers to 540,000 gallons per year.

Honda R&D is located in Union County. Union County is in attainment for all pollutants.

3. Source Emissions:

Honda R&D has requested to limit their potential HAP emissions by restricting coating material and cleanup solvent usage in emissions units K001, K002, K004 and K005. The resulting maximum potential HAP emissions from K001, K002, K004 and K005 are provided in the following table.

Material	Maximum Annual Usage Rate (gallons)	Density (lb/gal)	Maximum Individual HAP Content (% by wt)	Maximum Total HAP Content (% by wt)	Maximum Individual Annual HAPs (tons)*	Maximum Total Annual HAPs (tons)**
Coating Materials	2275.00	12.00	62%	100%	8.46	13.65
Cleaning Solvent	750.00	7.00	50%	90%	1.31	2.36
				Totals	9.78	16.01

* Using the highest Individual HAP coating material (%) and the highest density coating material (lb/gal), and using the actual cleaning solvent data.

**Using the highest Total HAP coating material (%) and the highest density coating material (lb/gal), and using the actual cleaning solvent data.



4. Administrative Modifications:

Facility-wide Terms and Conditions: Addition of CO and HAP limitations to avoid PSD and MACT.

B011: Updated BAT limits to reflect current AP-42 emission factors.

B040, B041, B013, B014, B015, B035, B036, B037, B042, B027, B031, B032, B033: Added OAC rule 3745-17-07(A) requirement. Added BAT for less than 10 ton per year pollutants as well as sunset/rise language.

K001, K002: Replaced OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)(1) requirements with OAC rule 3745-17-11(C) requirements. Removed OAC rule 3745-21-07 requirements and identified BAT limit for OC when coating non-metal parts as 40 pounds per day.

K004: Replaced OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)(1) requirements with OAC rule 3745-17-11(C) requirements. Removed OAC rule 3745-21-07 requirements. Pursuant to OAC rule 3745-21-07(M)(5)(g), as a facility in Union county with a potential to emit of less than 100 tons of OC per year, Honda R&D is exempt from the requirements of OAC rule 3745-21-07(M)(4).

K005: Removed OAC rule 3745-21-07 requirements.

P005, P006: Removed OAC rule 3745-21-07 requirements. Pursuant to OAC rule 3745-21-07(M)(5)(g), as a facility in Union county with a potential to emit of less than 100 tons of OC per year, Honda R&D is exempt from the requirements of OAC rule 3745-21-07(M)(4).

5. Conclusion:

The facility-wide terms and conditions contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure the CO and HAP emissions thresholds for PSD and MACT will not be exceeded. Issuance of P0116119 is recommended.



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Honda R & D North America Inc.**

Facility ID:	0180000156
Permit Number:	P0116119
Permit Type:	Administrative Modification
Issued:	4/11/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Honda R & D North America Inc.

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. Federally Enforceable Standard Terms and Conditions	5
2. Severability Clause	5
3. General Requirements	5
4. Monitoring and Related Record Keeping and Reporting Requirements.....	6
5. Scheduled Maintenance/Malfunction Reporting	7
6. Compliance Requirements	7
7. Best Available Technology	8
8. Air Pollution Nuisance	9
9. Reporting Requirements	9
10. Applicability	9
11. Construction of New Sources(s) and Authorization to Install	9
12. Permit-To-Operate Application	10
13. Construction Compliance Certification	11
14. Public Disclosure	11
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	11
16. Fees.....	11
17. Permit Transfers	11
18. Risk Management Plans	11
19. Title IV Provisions	11
B. Facility-Wide Terms and Conditions.....	12
C. Emissions Unit Terms and Conditions	19
1. B011, 12.5 MMBtu/hr Natural Gas Boiler	20
2. B040, NVH Dynamometer - Bldg. 13 (Room 115).....	23
3. B041, Transient Dynamometer	29
4. Emissions Unit Group -Dynamometers: B013,B014,B015,B035,B036,B037,B042.....	36
5. Emissions Unit Group -Dynamometers: B027,B031,B032,B033.....	42
6. Emissions Unit Group -Spray Booths: K001 and K002.....	48
7. K004, Paint Booth with oven	52



- 8. K005, Spray Booth..... 61
- 9. Emissions Unit Group -Ovens: P005 and P006..... 67



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
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): M0002556, M0002557, M0002558, M0002651, M0002652, M0002653, M0002697, M0002698
Permit Number: P0116119
Permit Description: Administrative modification to adjust BAT to reflect current emissions factors for natural gas combustion; add BAT requirements for less than 10 ton per year pollutants pursuant to Senate Bill 265; add OAC rule 3745-17-07(A) requirements; add facility-wide federally enforceable limitations to avoid MACT and PSD; and update applicable rule citations.
Permit Type: Administrative Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/11/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0116119
 Permit Description: Administrative modification to adjust BAT to reflect current emissions factors for natural gas combustion; add BAT requirements for less than 10 ton per year pollutants pursuant to Senate Bill 265; add OAC rule 3745-17-07(A) requirements; add facility-wide federally enforceable limitations to avoid MACT and PSD; and update applicable rule citations.

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

- | | |
|-----------------------------------|---------------------------------------|
| Emissions Unit ID: | B011 |
| Company Equipment ID: | 12.5 MMBtu/hr Natural Gas Boiler |
| Superseded Permit Number: | 01-4890 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | B040 |
| Company Equipment ID: | NVH Dynamometer - Bldg. 13 (Room 115) |
| Superseded Permit Number: | P0104142 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | B041 |
| Company Equipment ID: | B041 Transient Dynamometer |
| Superseded Permit Number: | P0104142 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K004 |
| Company Equipment ID: | Paint Booth with oven. |
| Superseded Permit Number: | 01-08305 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | K005 |
| Company Equipment ID: | Spray Booth |
| Superseded Permit Number: | P0108452 |
| General Permit Category and Type: | Not Applicable |

Group Name: Dynamometers

Emissions Unit ID:	B013
Company Equipment ID:	Performance Dynamometer (Rm. 101)
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B014
Company Equipment ID:	Performance Dynamometer - Building 13 Room 120
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B015
Company Equipment ID:	Durability Dynamometer (Rm. 105)
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B035
Company Equipment ID:	Trans. Dyno VSDI
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B036
Company Equipment ID:	Trans. Dyno VSDII



Effective Date: To be entered upon final issuance

Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B037
Company Equipment ID:	Trans. Dyno VSDIII
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B042
Company Equipment ID:	B042 Performance Dyn
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable

Group Name: Dynamometers

Emissions Unit ID:	B027
Company Equipment ID:	Performance Dynamometer, Bldg 5, Room 100B
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B031
Company Equipment ID:	Durability Dynamometer
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B032
Company Equipment ID:	Performance Dynamometer
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B033
Company Equipment ID:	Durability Dynamometer
Superseded Permit Number:	P0105648
General Permit Category and Type:	Not Applicable

Group Name: Ovens

Emissions Unit ID:	P005
Company Equipment ID:	Prep. Oven
Superseded Permit Number:	01-04055
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Paint/Surface Coat Oven
Superseded Permit Number:	01-04055
General Permit Category and Type:	Not Applicable

Group Name: Spray Booths

Emissions Unit ID:	K001
Company Equipment ID:	Prep. Booth & Air Makeup Heater
Superseded Permit Number:	01-04055
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Paint/Surface Coat Booth & Air Makeup Heater
Superseded Permit Number:	01-04055
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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



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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual



obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the “Air Services” facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in “Air Services” once the transfer is legally completed. The change must be submitted through “Air Services” within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. (“Act”), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
Facility ID: 0180000156
Effective Date: To be entered upon final issuance

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

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) 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.
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.
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.
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.
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.
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.

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.

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 (Ohio EPA, Central District Office).

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.
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.
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.



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
Facility ID: 0180000156

Effective Date: To be entered upon final issuance

13. The following emissions unit contained in this permit is subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc: 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.



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



1. 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)	<p>Particulate emissions (PE) shall not exceed 0.02 pound per hour.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour.</p> <p>Nitrogen oxides (NO_x) 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, SO₂, NO_x 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.

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.

(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).

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.

(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.

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.



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/10⁶scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10⁶scf 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).

c. Emission Limitation

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

Sulfur dioxide (SO₂) emissions shall not exceed 0.01 pound per hour.

Nitrogen oxides (NO_x) 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, 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.

g) Miscellaneous Requirements

(1) None.



2. 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	<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 0.10 pound per hour and 0.43 ton per year.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.18 pound per hour and 0.77 ton 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.
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)	Emissions from the combustion of gasoline in this emissions unit shall not



Effective Date: To be entered upon final issuance

	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, SO₂, 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 SO₂ 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 when the weather conditions allow, for any visible particulate emissions from the stack 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the quarterly check until the incident has ended. The observer may indicate that the visible emissions 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.
- 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.
 - (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.

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.

- 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.

- 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.

d. Emission Limitation

Sulfur dioxide (SO₂) 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 SO₂ emission limitation was established by multiplying an emission factor 5.31 pounds of SO₂ 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 SO₂ 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 SO₂ 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.

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 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.



f. Emission Limitation

Nitrogen oxides (NOx) emissions shall not exceed 3.37 pounds per hour and 14.74 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 (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 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.

g. Emission Limitation

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

Applicable Compliance Method

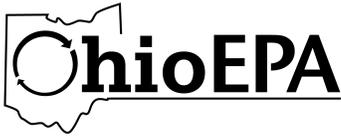
The hourly CO emission limitation was established by multiplying an emission factor 446.4 pounds of CO per 1,000 gallons of gasoline burned by the emissions unit's maximum gasoline usage rate (33 gal/hr). The emission factor was established using emission test data from a similar emissions unit tested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

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.

g) Miscellaneous Requirements

- (1) None.



3. B041, Transient Dynamometer

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	<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 (SO₂) 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_x) 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>



Effective Date: To be entered upon final issuance

	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)	<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, SO₂, OC, NO_x 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, SO₂, OC and NO_x 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.
- 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.



- (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.

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.

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.

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.

d. Emissions Limitation

Sulfur dioxide (SO₂) 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 SO₂ emission limitation was established by multiplying an emission factor 5.31 pounds of SO₂ 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 SO₂ 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 SO₂ 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.

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.

f. Emissions Limitation

Nitrogen oxides (NO_x) 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_x emission limitation was established by multiplying an emission factor 102 pounds of NO_x 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_x 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_x 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.

g. Emissions Limitation

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

Applicable Compliance Method

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.



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
Facility ID: 0180000156
Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.



4. 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	Building 14 - Transmission Dynamometer 1
B036	Building 14 - Transmission Dynamometer 2
B037	Building 14 - Transmission Dynamometer 3
B042	Building 5 - Performance Dynamometer controlled by Thermal Incinerator

- 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	<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 0.34 pound per hour and 1.48 tons per year.</p> <p>Sulfur dioxide (SO₂) 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),	See b)(2)c. below.



Effective Date: To be entered upon final issuance

	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)	<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>

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO₂, OC, NO_x 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 SO₂ 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) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

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

a. 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.

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.

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 lb PE/gal x 60 gal/hr) + (20% x 0.0047 lb PE/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 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.

d. Emissions Limitation

Sulfur dioxide (SO₂) 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 SO₂ emission limitation was established by multiplying an emission factor 5.31 pounds of SO₂ 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 SO₂ 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 SO₂ 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.



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.

f. Emissions Limitation

Nitrogen oxides (NO_x) emissions shall not exceed 3.60 pounds per hour and 15.77 tons per year.

Applicable Compliance Method

The hourly NO_x limitation was established by multiplying an emission factor of 0.050 pound of NO_x per gallon of gasoline burned by the emissions unit's maximum gasoline usage rate (60 gal/hr) and adding a 20% safety factor $[(0.050 \text{ lbNO}_x/\text{gal} \times 60 \text{ gal/hr}) + (20\% \times 0.050 \text{ lbNO}_x/\text{gal} \times 60 \text{ gal/hr})]$. The emission factor was established using emission test data from a similar emissions unit tested on June 2, 2001.

The annual NO_x 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_x 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.

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.

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.

g) Miscellaneous Requirements

(1) None.



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

EU ID	Operations, Property and/or Equipment Description
B027	engine testing dynamometer in Building 5
B031	Durability Dynamometer 13-121 (One AVL Cradle Mounted Dyno With Hydrostatic Option: Model: DynoExact APA 302/10 PO)
B032	Performance Dynamometer 5-103 (One AVL Cradle Mounted Dyno with Hydrostatic Option: Model DynoExact APA 302/10 PO)
B033	Durability Dyno-Building 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	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations: Particulate emissions (PE) shall not exceed 0.39 pound per hour and 1.70 tons per year. Sulfur dioxide (SO ₂) 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), 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)	<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>

(2) Additional Terms and Conditions

- a. The hourly and annual PE, SO₂, OC, NO_x 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 SO₂ 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) None.

e) Reporting Requirements

- (1) None.

f) Testing Requirements

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

- a. 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.

- 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.



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.

d. Emissions Limitation

Sulfur dioxide (SO₂) 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 SO₂ emission limitation was established by multiplying an emission factor 5.31 pounds of SO₂ 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 SO₂ 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 SO₂ 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.

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.

f. Emissions Limitation

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

Applicable Compliance Method

The hourly NO_x emission limitation was established by multiplying an emission factor 102 pounds of NO_x 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 NO_x 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_x 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.



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.

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.

g) Miscellaneous Requirements

(1) None.



6. 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)	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



OCemissions 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.
- (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.

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.
- (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.
- (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.
- (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.

- (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.

- (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.

- (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.

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.
- (2) The permittee shall notify the director (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.
- (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.

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).

- 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).

g) Miscellaneous Requirements

- (1) None.



7. 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)(2)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)	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 _x ; 0.53 ton/yr of NO _x ; 0.10 lb/hr of CO; 0.44 ton/yr of CO; 0.002 lb/hr of PE;



Effective Date: To be entered upon final issuance

	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.
- (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.

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.



- (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.
- (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.
- (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.

- (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.
- (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.
- (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.
- (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/m³): 434

Maximum Hourly Emission Rate (lb/hr): 11.06

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,142

MAGLC (ug/m³): 10,333

Toxic Contaminant: styrene

TLV (mg/m³): 85

Maximum Hourly Emission Rate (lb/hr): 5.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,027

MAGLC (ug/m³): 2,024

Toxic Contaminant: formaldehyde

TLV (mg/m³): 0.368

Maximum Hourly Emission Rate (lb/hr): 0.026

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4.92

MAGLC (ug/m³): 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).

- (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.

- (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.
- (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.



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.
- (2) The permittee shall notify the director (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.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any daily record showing that the dry particulate filtration controlsystem 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.

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.



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/10⁶scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10⁶scf 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).

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).

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).

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).

f. Emission Limitation

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



Draft Permit-to-Install
Honda R & D North America Inc.
Permit Number: P0116119
Facility ID: 0180000156
Effective Date: To be entered upon final issuance

0.12 lb/hr of NO_x;
0.53 ton/yr of NO_x;
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.

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.

- (2) U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of coatings and cleanup materials.
- g) Miscellaneous Requirements
- (1) None.



8. 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	Volatile organic compound (VOC) emissions shall not exceed 2.16 pounds per hour and 9.45 tons per year. Particulate emissions (PE) shall not exceed 0.004 pound per hour and 0.015 ton per year. See b)(2)b. through b)(2)d. below.
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.



- 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.
- (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.

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.



- (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.
- (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.
- (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.

- (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.
 - (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.
- e) Reporting Requirements
- (1) 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.

- (2) 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.
- (3) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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).

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.

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 = 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

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%)

CE₁ = control efficiency of the waterwash (assumed to be 96%)

CE₂ = 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.

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



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g) Miscellaneous Requirements

- (1) None.



9. 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)	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.
- 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.



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/10⁶scf natural gas emission factor into lbPE/MMBtu by dividing by 1,020 Btu/10⁶scf 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).

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).

d. Emission Limitation

Nitrogen oxides (NOx) 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 NOx emission limitation was determined by multiplying the maximum natural gas usage in this emissions unit by the emission factor for NOx found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Table 1.4-1.

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.

e. None.



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g) Miscellaneous Requirements

- (1) None.