



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

7/11/2016

Certified Mail

Mr. John Eckstein  
 Honda Engineering North America, Inc.  
 24000 Honda Parkway  
 Marysville, OH 43040-9251

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0180010199  
 Permit Number: P0121038  
 Permit Type: Initial Installation  
 County: Union

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

Dear Permit Holder:

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](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified 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 E. Hopkins, P.E.  
 Assistant Chief, Permitting Section, DAPC

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



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Honda Engineering North America, Inc. (Honda) has requested a permit for a new coating and application testing facility located on the Honda of America Mfg., Inc. campus.

3. Facility Emissions and Attainment Status:

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

Facility Name	Ohio EPA Facility ID Number
Marysville Automobile Plant	180010193
East Liberty Automobile Plant	546000117
Honda North American Engineering	180010199
Honda Company Facilities	180010197
Honda Performance Manufacturing Center	180010413
Midwest Express, Inc.	546000133

Union and Logan Counties are in attainment for all regulated pollutants.

The VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, PM<sub>10</sub>, PM<sub>2.5</sub> and GHG emissions from these facilities are subject to PALs established in accordance with OAC rule 3735-31-32. The PAL requirements are located in Section B. Facility-Wide Terms and Conditions of the permits issued to each of these facilities. As long as the combined emissions from these facilities remain under the PALs, Honda can make physical changes or changes in the method(s) of operations without obtaining a New Source Review permit.

The installation and operation of the new coating and application testing facility will not result in an exceedance of Honda's PALs. Therefore, the new emissions units do not have to be approved through the New Source Review program prior to installation, but are still subject to all other applicable state and federal rules and regulations.

On May 1, 2016, OAC rule 3745-31-05(A)(3)(a)(iv) was revised to state "BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director." This paragraph has not yet been approved by U.S. EPA as part of the Ohio SIP. Until this BAT exemption is part of the SIP, BAT must be established in a PTI in accordance with the SIP-approved version of OAC rule 3745-31-05(A)(3). To fulfill this requirement, Ohio EPA has requested Honda to submit administrative permit modifications to establish any new or modified BAT determinations in a PTI. When OAC rule 3745-31-05(A)(3)(iv) is approved as part of the Ohio SIP, Honda will no longer be required to obtain a PTI for physical changes or changes in the method(s) of operation that do not result in a PAL exceedance.



**Permit Strategy Write-Up**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199

4. Conclusion:

The issuance of P0121038 is recommended.

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:<http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:[HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install Initial Installation

Honda Engineering North America, Inc.

24000 Honda Parkway,, Marysville, OH 43040-9251

ID#:P0121038

Date of Action: 7/11/2016

Permit Desc:PTI to establish BAT for new research and testing activities subject to plant-wide applicability limits..

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 ID # 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





**DRAFT**

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

Facility ID:	0180010199
Permit Number:	P0121038
Permit Type:	Initial Installation
Issued:	7/11/2016
Effective:	To be entered upon final issuance





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

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**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0180010199  
Facility Description: Engineering services, production tooling and equipment.  
Application Number(s): A0055027  
Permit Number: P0121038  
Permit Description: PTI to establish BAT for new research and testing activities subject to plant-wide applicability limits.  
Permit Type: Initial Installation  
Permit Fee: \$300.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 7/11/2016  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Honda Engineering North America, Inc.  
24000 Honda Parkway  
Marysville, OH 43040-9251

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0121038

Permit Description: PTI to establish BAT for new research and testing activities subject to plant-wide applicability limits.

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

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	TMP199321
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	TMP199320
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	TMP199322
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

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

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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

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

**3. General Requirements**

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

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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

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

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

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

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

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

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

## **7. Best Available Technology**

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

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

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

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

## **12. Permit-To-Operate Application**

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

**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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.



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. Establishment of Plantwide Applicability Limitations (PALs)
  - a) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,125.9 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 tons per year on a rolling, 12-month basis.
  - b) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) carbon monoxide (CO) emission limitation of 236.4 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide CO emissions from 2005 and 2006 of 138.9 and 134.0 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136.4 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 99.9 tons of CO, the adjusted baseline actual facility-wide CO emissions are 236.4 tons per year on a rolling, 12-month basis.
  - c) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) nitrogen oxides (NOx) emission limitation of 203.0 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide NOx emissions from 2005 and 2006 of 165.2 and 160.9 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 163.1 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of NOx, the adjusted baseline actual facility-wide NOx emissions are 203.0 tons per year on a rolling, 12-month basis.
  - d) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate matter (PM) emission limitation of 133.1 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide PM emissions from 2004 and 2005 of 107.4 and 109.0 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.2 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 24.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 133.1 tons per year on a rolling, 12-month basis.
  - e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>10</sub> emission limitation of 93.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide PM<sub>10</sub> emissions from 2004 and 2005 of 78.2 and 79.4 tons, respectively. Average facility-wide PM<sub>10</sub> emissions for 2004 and 2005 are 78.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM<sub>10</sub>,

the adjusted baseline actual facility-wide PM<sub>10</sub> emissions are 93.7 tons per year on a rolling, 12-month basis.

- f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>2.5</sub> emission limitation of 64.4 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 2004 and 2005 of 54.2 and 54.8 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 2004 and 2005 are 54.5 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM<sub>2.5</sub>, the adjusted baseline actual facility-wide PM<sub>2.5</sub> emissions are 64.4 tons per year on a rolling, 12-month basis.
- g) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide SOx emissions from 2004 and 2005 of 2.8 and 2.9 tons, respectively. Average facility-wide SOx emissions for 2004 and 2005 are 2.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of SOx, the adjusted baseline actual facility-wide SOx emissions are 42.7 tons per year on a rolling, 12-month basis.
- h) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) greenhouse gas (GHG) emission limitation of 264,626 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide GHG emissions from 2005 and 2006 of 191,727 and 187,528 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,628 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 74,999 tons of GHG, the adjusted baseline actual facility-wide GHG emissions are 264,626 tons per year on a rolling, 12-month basis.

[OAC rule 3745-31-32]

### 3. Plantwide Applicability Limitations (PALs)

#### a) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) VOC emissions shall not exceed 2,125.9 tons per year on a rolling, 12-month basis.

#### Applicable Compliance Method:

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



emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

b) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) CO emissions shall not exceed 236.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

c) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) NOx emissions shall not exceed 203.0 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

d) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM emissions shall not exceed 133.1 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM emissions on a rolling, 12-month basis from all emissions units that emit PM at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de

minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>10</sub> emissions shall not exceed 93.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

f) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM<sub>2.5</sub> emissions shall not exceed 64.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

g) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) SO<sub>x</sub> emissions shall not exceed 42.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

h) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) GHG emissions shall not exceed 264,626 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

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

[OAC rule 3745-31-32]

4. PAL Monitoring and Recordkeeping Requirements

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

- d) Natural gas usage for process and building heat shall be monitored using the billing meters associated with the facility (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133). By using the billing meters, the permittee will have collected natural gas usage for significant and insignificant emission units located at the facility. Monthly VOC, PM<sub>2.5</sub>, PM<sub>10</sub>, PM, NO<sub>x</sub>, CO, SO<sub>2</sub>, and GHG emissions shall be calculated from the monthly usage records and the applicable AP-42 emission factors. These emissions shall be included in the compliance demonstrations for each applicable Plantwide Applicability Limit specified in section B.3 of this permit. The permittee shall have the option to subtract natural gas usage associated with mobile sources from the billing records provided adequate records are maintained to substantiate the deduction.

[OAC rule 3745-31-32]

5. PAL Reporting Requirements

- a) The permittee shall submit semi-annual monitoring reports and prompt deviation reports to the Ohio EPA, Central District Office in accordance with the applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(M)]:

(1) Semi-annual report:

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

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

that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of any pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(K)(7)).

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

(2) Deviation report:

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

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

(3) Re-validation results:

The owner or operator shall submit to the Ohio EPA, Central District Office the results of any re-validation test or method conducted pursuant to OAC rule 3745-31-32(K)(9) within three months after completion of such test or method.

[OAC rule 3745-31-32]

6. PAL Compliance Demonstration

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



PM<sub>2.5</sub> emissions and determining the rolling, 12-month VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.

[OAC rule 3745-31-32]

7. PAL Permit Requirements

- a) The PAL in section B shall be effective for ten years. The PAL term commenced on March 28, 2014.
- b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by the Central District Office within the time frame specified. (OAC rule 3745-31-32(I)(2))
  - (1) If the permittee fails to meet the application requirements in section B or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(H).
- c) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in a PAL provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.
  - (1) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the Ohio EPA, Central District Office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

[OAC rule 3745-31-32]

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

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

- a) New installation of an emissions unit that emits a toxic air contaminant identified under OAC rule 3745-114-01;
- b) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a toxic air contaminant with a lower Threshold Limit Value (TLV), as

indicated in the most recent version of the handbook entitled “American Conference of Governmental Industrial Hygienists (ACGIH)”, than the lowest TLV value previously evaluated;

- c) Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant that was previously modeled; and
- d) Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

[OAC rule 3745-114-01 and ORC 3704.03(F)(3) and (4)]

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

a) Background

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

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

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL

permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.

b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

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

c) The results of the BAT determination shall include, at a minimum, the following:

- (1) a description of the type of emissions unit evaluated;
- (2) the numerical BAT value selected;

- (3) the emission rate unit selected;
- (4) a description of any associated control equipment selected as BAT;
- (5) a description of any federally enforceable restrictions requested to be used; and
- (6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.

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

- d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, recordkeeping, and reporting selected to support the BAT determination.
- e) The BAT determination selected by the owner or operator, and its associated monitoring, recordkeeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.
- f) The requirements outlined in B.9.b) through B.9.d), and the following paragraph, shall be considered void and no longer required for changes subject to an effective PAL and made in compliance with the requirements of the PAL permit once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iv) (the BAT exemption for PAL sources) as part of the Ohio SIP.

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

10. New or Modified Emissions Unit BAT Reporting

Under OAC rule 3745-31-32(M)(1)(d), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC rule 3745-31-32(M)(1) for the required semi-annual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.9.b).

[OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-32(M)]



**Draft Permit-to-Install**  
Honda Engineering North America, Inc.  
**Permit Number:** P0121038  
**Facility ID:** 0180010199  
**Effective Date:** To be entered upon final issuance

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

**1. K001, TMP199321**

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

Coating booth with natural gas-fired air supply units and oven used for testing solvent/waterborne coatings and application equipment on a variety of substrates

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)d., b)(1)e., b)(1)f., b)(1)h., b)(2)c., b)(2)d., b)(2)f. and f)(1)e.

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), c)(2).
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	Coatings employed on metal parts and products shall not exceed 10 gallons per day (gal/day).
c.	OAC rule 3745-31-05(A)(3)  [Best Available Technology for VOC, PM <sub>10</sub> , PM <sub>2.5</sub> , NO <sub>x</sub> , SO <sub>2</sub> and CO]	VOC emissions shall not exceed 0.40 tons per month, averaged over a 12-month rolling period.  PM <sub>10</sub> emissions shall not exceed 0.04 tons per month, averaged over a 12-month rolling period.  PM <sub>2.5</sub> emissions shall not exceed 0.04 tons per month, averaged over a 12-month rolling period.  NO <sub>x</sub> emissions shall not exceed 0.33 tons per month, averaged over a 12-month rolling period.  SO <sub>2</sub> emissions shall not exceed 0.002 tons per month, averaged over a 12-month rolling period.  CO emissions shall not exceed 0.28 tons per month, averaged over a 12-month rolling period.  See b)(2)b. and b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, PM <sub>10</sub> , PM <sub>2.5</sub> , NO <sub>x</sub> , SO <sub>2</sub> and CO emissions from this air contaminant source because the controlled potential to emit for each pollutant is less than 10 tons per year, taking into account the voluntary restriction under OAC rule 3745-31-05(E).  See b)(2)c.
e.	OAC rule 3745-31-05(A)(3)(a)(iv)	See b)(2)d.
f.	OAC rule 3745-31-05(E)  [State-only enforceable limitation to avoid BAT]	VOC emissions shall not exceed 10 tons per year.  See b)(2)c.
g.	OAC rule 3745-31-32(F)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO <sub>x</sub> , CO, SO <sub>2</sub> , GHG, PM, PM <sub>10</sub> , and PM <sub>2.5</sub> emissions apply to this emissions unit. The PALs for VOC, NO <sub>x</sub> , CO, SO <sub>2</sub> , GHG, PM, PM <sub>10</sub> , and PM <sub>2.5</sub> are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO <sub>x</sub> , CO, SO <sub>2</sub> , GHG, PM, PM <sub>10</sub> , and PM <sub>2.5</sub> emissions from this facility as specified in B.3.
h.	OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and (F)(4)  [Toxic air contaminants]	See the Facility-Wide Terms and Conditions and b)(2)f.

(2) Additional Terms and Conditions

- a. This emissions unit shall be used for research and testing purposes only.
- b. These BAT emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

- d. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iv) (the BAT exemption for PAL sources) as part of the Ohio SIP. The following requirements shall be considered void when this emissions unit is subject to an effective PAL:
    - i. Section b)(1)c., b)(1)d., b)(1)e.;
    - ii. Section b)(2)b., b)(2)c., b)(2)e.; and
    - iii. Section f)(1)b. through f)(1)e.
  - e. The monthly NO<sub>x</sub>, SO<sub>2</sub> and CO emissions limitations were established to reflect the potentials to emit from the burning of natural gas in the air supply units and oven associated with this emissions unit. Therefore, it is not necessary to establish monitoring, recordkeeping or reporting requirements to ensure compliance with these limits.
  - f. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined by OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.  
[OAC rule 3745-17-11(C)(1) and (2)(b)]
  - (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.  
[OAC rule 3745-17-11(C)(2)(e)]
  - (3) The permittee shall burn only natural gas as fuel in this emissions unit.  
[OAC rule 3745-31-05]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for coatings employed to metal components and/or parts:
  - a. the name and identification of each coating employed;
  - b. the total volume of each coating employed; and
  - c. the total volume, in gallons, of all coatings employed.

[OAC rule 3745-21-09(B)(3)]

- (2) The permittee shall collect and record the following information each month:
  - a. the name and identification of each coating employed;
  - b. the VOC and solids content of each coating employed;
  - c. the number of gallons of each coating employed;
  - d. the total VOC, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from all coatings employed, in pounds or tons; and
  - e. the rolling, 12-month summation of VOC, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from all coatings, in tons.

[OAC rule 3745-31-05 and OAC rule 3745-31-32(F)]

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

[OAC rule 3745-31-05]

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

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (6) 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 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 manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

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

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter 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 filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(e),(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the director (the 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 to metal components and/or parts. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. each day when a fuel other than natural gas was burned in this emissions unit; and
  - b. any record showing that the dry particulate filter 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.

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

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

f) Testing Requirements

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

a. Emissions Limitation:

Coatings employed on metal parts and products shall not exceed 10 gal/day.

Applicable Compliance Method:

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

b. Emissions Limitation:

VOC emissions shall not exceed 0.40 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The VOC emissions limitation was established by summing the maximum potential VOC emissions from natural gas combustion in the burners associated with this emissions unit (0.22 ton/yr) and the requested allowable VOC emissions from coatings (4.62 ton/yr) and dividing by 12 months per year. Compliance shall be assumed provided the total VOC emissions from coatings do not exceed 4.62 tons per rolling, 12-month period.

Compliance shall be determined through the monthly recordkeeping specified in Section d)(2) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

c. Emissions Limitations:

PM<sub>10</sub> emissions shall not exceed 0.04 tons per month, averaged over a 12-month rolling period.

PM<sub>2.5</sub> emissions shall not exceed 0.04 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The PM<sub>10</sub> and PM<sub>2.5</sub> emissions limitations were established by summing the maximum potential emissions from natural gas combustion in the burners associated with this emissions unit (0.30 ton/yr) and the requested allowable



emissions from coatings (0.12 ton/yr) and dividing by 12 months per year. The limits take into account a 40% transfer efficiency and a 95% particulate control efficiency. Compliance shall be assumed provided the total PM<sub>10</sub> and PM<sub>2.5</sub> emissions from coatings do not exceed 0.12 tons per rolling, 12-month period.

Compliance shall be determined through the monthly recordkeeping specified in Section d)(2) above.

d. Emissions Limitations:

NO<sub>x</sub> emissions shall not exceed 0.33 tons per month, averaged over a 12-month rolling period.

SO<sub>2</sub> emissions shall not exceed 0.002 tons per month, averaged over a 12-month rolling period.

CO emissions shall not exceed 0.28 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

These emissions limitations were established to reflect the potentials to emit based on the maximum fuel usage of the emissions unit (9,000 scf/hr) and the emissions factor for each pollutant found in AP-42, Section 1.4, Tables 1.4-1 and 1.4-2, as follows.

$$\text{NO}_x: (9,000 \text{ ft}^3/\text{hr}) (100 \text{ lb NO}_x/10^6 \text{ scf}) (730 \text{ hr}/\text{mo}) / (2,000 \text{ lb}/\text{ton}) = 0.33 \text{ ton}/\text{mo}$$

$$\text{SO}_2: (9,000 \text{ scf}/\text{hr}) (0.6 \text{ lb SO}_2/10^6 \text{ scf}) (730 \text{ hr}/\text{mo}) / (2,000 \text{ lb}/\text{ton}) = 0.002 \text{ ton}/\text{mo}$$

$$\text{CO}: (9,000 \text{ ft}^3/\text{hr}) (84 \text{ lb CO}_2/10^6 \text{ scf}) (730 \text{ hr}/\text{mo}) / (2,000 \text{ lb}/\text{ton}) = 0.28 \text{ ton}/\text{mo}$$

Compliance is based on burning only natural gas in the emissions unit.

e. Emissions Limitation:

VOC emissions shall not exceed 10 tons per year.

Applicable Compliance Method:

The VOC emissions limitation was established to reflect the summation of the total VOC emissions from natural gas combustion in the burners associated with this emissions unit (0.22 ton/yr) and the total VOC emissions from coatings divided by 12 months per year. Compliance shall be assumed provided the total VOC emissions from coatings do not exceed 9.78 tons per rolling, 12-month period.



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

**Permit Number:** P0121038

**Facility ID:** 0180010199

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

Compliance shall be determined through the monthly recordkeeping specified in Section d)(2) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

g) Miscellaneous Requirements

- (1) None.



**2. K002, TMP199320**

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

Misc. Coating Test Operations - Source includes but is not limited to testing of sealer, deadener, MVH Foam materials and application equipment.

- 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)c., b)(1)d., b)(1)e., b)(1)g., b)(2)c., b)(2)d., b)(2)e. and f)(1)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 3745-21-09(U)(1)(i)	The VOC content of each sealer, deadener, and acoustic foam applied to metal in this emissions unit shall not exceed 3.0 lb/gal, excluding water and exempt solvents.
b.	OAC rule 3745-31-05(A)(3) [Best Available Technology for VOC]	VOC emissions shall not exceed 0.16 tons per month, averaged over a 12-month rolling period.  See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit is less than 10 tons per year, taking into account the voluntary restriction under OAC rule 3745-31-05(E).  See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(a)(iv)	See b)(2)d.
e.	OAC rule 3745-31-05(E)  [State-only enforceable limitation to avoid BAT]	VOC emissions shall not exceed 10 tons per year.  See b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-32(F)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC emissions apply to this emissions unit. The PALs for VOC are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.3.
g.	OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and (F)(4)  [Toxic air contaminants]	See the Facility-Wide Terms and Conditions and b)(2)e.

(2) Additional Terms and Conditions

- a. This emissions unit shall be used for research and testing purposes only.
- b. These BAT emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iv) (the BAT exemption for PAL sources) as part of the Ohio SIP. The following requirements shall be considered void when this emissions unit is subject to an effective PAL:
  - i. Section b)(1)b., b)(1)c., b)(1)d.;
  - ii. Section b)(2)b., b)(2)c.; and
  - iii. Section f)(1)b. and f)(1)c.
- e. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined by OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit.

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 name and identification of each sealer, deadener, and acoustic foam employed;
- b. the VOC content of each sealer, deadener, and acoustic foam employed;
- c. the number of gallons of each sealer, deadener, and acoustic foam employed;
- d. the total VOC emissions from all sealers, deadeners, and acoustic foams employed, in pounds or tons; and
- e. the rolling, 12-month summation of VOC emissions from all sealers, deadeners, and acoustic foams, in tons.

[OAC rule 3745-21-09(B)(3), OAC rule 3745-31-05 and OAC rule 3745-31-32(F)]

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lb VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

[OAC rule 3745-21-09(B)(3)]

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:

The VOC content of each sealer, deadener, and acoustic foam applied to metal in this emissions unit shall not exceed 3.0 lb/gal, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(1). Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.



b. Emissions Limitation:

VOC emissions shall not exceed 0.16 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

The VOC emissions limitation was established by dividing the requested allowable VOC emissions from all sealers, deadeners and acoustic foams (1.89 ton/yr) and by 12 months per year. Compliance shall be assumed provided the total VOC emissions from all sealers, deadeners and acoustic foams do not exceed 1.89 tons per rolling, 12-month period.

Compliance shall be determined through the monthly recordkeeping specified in Section d)(1) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

c. Emissions Limitation:

VOC emissions shall not exceed 10 tons per year.

Applicable Compliance Method:

Compliance shall be determined through the monthly recordkeeping specified in Section d)(1) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

g) Miscellaneous Requirements

(1) None.

**3. P001, TMP199322**

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

EGA facility wide purge and clean-up solvent usage. Includes purging and miscellaneous clean-up solvent use.

- 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)b., b)(1)c., b)(1)d., b)(1)f., b)(2)c., b)(2)d., b)(2)e. and f)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [Best Available Technology for VOC]	VOC emissions shall not exceed 0.33 tons per month, averaged over a 12-month rolling period.  See b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the potential to emit is less than 10 tons per year, taking into account the voluntary restriction under OAC rule 3745-31-05(E).  See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(iv)	See b)(2)d.
d.	OAC rule 3745-31-05(E) [State-only enforceable limitation to avoid BAT]	VOC emissions shall not exceed 10 tons per year.  See b)(2)c.
e.	OAC rule 3745-31-32(F)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC emissions apply to this emissions unit. The PALs for VOC are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.3.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and (F)(4)  [Toxic air contaminants]	See the Facility-Wide Terms and Conditions and b)(2)e.

(2) Additional Terms and Conditions

- a. This emissions unit shall consist of purge and miscellaneous clean-up solvent usage associated with research and testing activities only.
- b. These BAT emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iv) (the BAT exemption for PAL sources) as part of the Ohio SIP. The following requirements shall be considered void when this emissions unit is subject to an effective PAL:
  - i. Section b)(1)a., b)(1)b., b)(1)d.;
  - ii. Section b)(2)b., b)(2)c.; and
  - iii. Section f)(1)a. and f)(1)b.
- e. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined by OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit.

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 name and identification of each purge, cleanup, and miscellaneous solvent material employed at the facility;
  - b. the VOC content of each purge, cleanup, and miscellaneous solvent material, in pounds per gallon;
  - c. the number of gallons of each purge, cleanup, and miscellaneous solvent material employed; and
  - d. the total VOC emissions from all purge, cleanup, and miscellaneous solvent material, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all purge, cleanup, and miscellaneous solvent material employed at the facility, times each material's VOC content (b).
- (2) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered purge, cleanup, and miscellaneous solvent materials and the recovery container:
- a. the date the recovery container was emptied;
  - b. the date the materials from the recovery container were shipped off site;
  - c. the number of gallons of materials from the recovery container shipped off site;
  - d. the VOC content of the materials from the recovery container, in pounds per gallon, acquired from the testing results of the recovered material; and
  - e. the total VOC emissions (in pounds or tons) from recovered materials (purge, cleanup, and miscellaneous solvents) to be credited against the total VOC emissions from all purge, cleanup, and miscellaneous solvent material employed at the facility, i.e., (c) x (d).
- (3) The permittee shall maintain monthly records of the rolling, 12-month VOC emissions from all purge, cleanup, and miscellaneous solvent materials employed at the facility.
- 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:  
VOC emissions shall not exceed 0.33 tons per month, averaged over a 12-month rolling period.



Applicable Compliance Method:

The VOC emissions limitation was established dividing the requested allowable VOC emissions from all purge, cleanup, and miscellaneous solvent materials (4.01 ton/yr) by 12 months per year. Compliance shall be assumed provided the total VOC emissions from all purge, cleanup, and miscellaneous solvent materials do not exceed 4.01 tons per rolling, 12-month period.

Compliance shall be determined through the monthly recordkeeping specified in Sections d)(1) through d)(3) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

b. Emissions Limitation:

VOC emissions shall not exceed 10 tons per year.

Applicable Compliance Method:

Compliance shall be determined through the monthly recordkeeping specified in Sections d)(1) through d)(3) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

g) Miscellaneous Requirements

(1) None.