



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

9/1/2016

Certified Mail

Mr. Ryan Coleman
HONDA OF AMERICA, EAST LIBERTY PLANT
11000 State Route 347
East Liberty, OH 43319

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0546000117
Permit Number: P0120917
Permit Type: OAC Chapter 3745-31 Modification
County: Logan

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

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
Ohio EPA-SWDO; Indiana



Response to Comments

| | |
|---|--|
| Facility ID: | 0546000117 |
| Facility Name: | HONDA OF AMERICA, EAST LIBERTY PLANT |
| Facility Description: | Auto Assembly Plant |
| Facility Address: | 11000 St. Rt. 347 East Liberty, OH 43319-9407 Logan County |
| Permit: | P0120917, Permit-To-Install - OAC Chapter 3745-31 Modification |
| A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Bellefontaine Examiner on 07/28/2016. The comment period ended on 08/27/2016. | |
| Hearing date (if held) | |
| Hearing Public Notice Date (if different from draft public notice) | |

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

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

1. Topic: None

- a. Comment: None
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT**

Facility ID: 0546000117
Permit Number: P0120917
Permit Type: OAC Chapter 3745-31 Modification
Issued: 9/1/2016
Effective: 9/1/2016



Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT

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Final Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0120917
Facility ID: 0546000117
Effective Date: 9/1/2016

Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0055730
Permit Number: P0120917
Permit Description: Honda of America East Liberty Plant will be modifying the topcoat process equipment to allow for adjusted material delivery rates. OC and PM emissions will increase as a result of these modifications.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 9/1/2016
Effective Date: 9/1/2016

This document constitutes issuance to:

HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347
East Liberty, OH 43319-9407

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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120917

Permit Description: Honda of America East Liberty Plant will be modifying the topcoat process equipment to allow for adjusted material delivery rates. OC and PM emissions will increase as a result of these modifications.

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

Group Name: Topcoat at ELP

| | |
|----------------------------------|------------------------|
| Emissions Unit ID: | K005 |
| Company Equipment ID: | Topcoat Coating Line A |
| Superseded Permit Number: | P0113358 |
| General Permit Category andType: | Not Applicable |
| Emissions Unit ID: | K006 |
| Company Equipment ID: | Topcoat Coating Line B |
| Superseded Permit Number: | P0113358 |
| General Permit Category andType: | Not Applicable |



Final Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0120917
Facility ID: 0546000117
Effective Date:9/1/2016

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, Southwest 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, Southwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southwest 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, Southwest 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, Southwest 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, Southwest 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, Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

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

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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0120917
Facility ID: 0546000117
Effective Date:9/1/2016

B. Facility-Wide Terms and Conditions

1. **All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:**
 - a) B.8., below.
2. **Establishment of Plant-wide 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) PM₁₀ emission limitation of 93.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide PM₁₀ emissions from 2004 and 2005 of 78.2 and 79.4 tons, respectively. Average facility-wide PM₁₀ emissions for 2004 and 2005 are 78.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM₁₀,

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

- f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{2.5} emission limitation of 64.4 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(E) and is based upon actual facility-wide PM_{2.5} emissions from 2004 and 2005 of 54.2 and 54.8 tons, respectively. Average facility-wide PM_{2.5} emissions for 2004 and 2005 are 54.5 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM_{2.5}, the adjusted baseline actual facility-wide PM_{2.5} emissions are 64.4 tons per year on a rolling, 12-month basis.
- g) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.7 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(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.

3. Plant-wide Applicability Limitations (PALs)

a) Emission Limitation:

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

Applicable Compliance Method:

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

b) Emission Limitation:

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

Applicable Compliance Method:

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

c) Emission Limitation:

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

Applicable Compliance Method:

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

d) Emission Limitation:

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

Applicable Compliance Method:

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

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

e) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM₁₀ emissions shall not exceed 93.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM₁₀ emissions on a rolling, 12-month basis from all emissions units that emit PM₁₀ at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM₁₀ emissions from significant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

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

Applicable Compliance Method:

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

g) Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO_x emissions on a rolling, 12-month basis from all emissions units that emit SO_x at the facility, (Premise numbers 0180010193,

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

h) Emission Limitation:

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

Applicable Compliance Method:

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

4. **PAL Monitoring and Record Keeping Requirements**

- a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's 12-month rolling total emissions, for 5 years from the date of such record.
- b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:
 - (1) a copy of the PAL permit application and any applications for revisions to the PAL; and
 - (2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.
- c) The permittee shall monitor all emissions units at the combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) for VOC, PM_{2.5}, PM₁₀, NO_x, CO, SO₂, 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_{2.5}, PM₁₀, PM, NO_x, CO, SO₂, and GHG emissions shall be

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

5. PAL Reporting Requirements

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

(1) Semi-annual report:

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

- a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.
- b. Total annual emissions (tons per year) based on a twelve-month rolling total for each month in the reporting period recorded pursuant to B.3 of these terms and conditions.
- c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.
- d. A list of any emissions units modified or added to the major stationary source during the preceding six-month period.
- 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 appropriate Ohio EPA District Office the results of any re-validation test or method within three months after completion of such test or method.

6. PAL Compliance Demonstration

- a) Emission calculations to demonstrate compliance with the PAL include VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions from startups, shutdowns, and malfunctions.
- b) The permittee shall determine monthly VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions in accordance with the Monitoring and Recordkeeping Requirements for each emissions unit for the purpose of summing plant-wide VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions and determining the rolling, 12-month VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions.

7. PAL Permit Requirements

- a) The PAL in section B shall be effective for ten years. The PAL term commences on the date of issuance of this permit.
- b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire



until a revised PAL permit is issued if a complete application is received by appropriate 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 emissions limitations provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.

(1) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the appropriate Ohio EPA District office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

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

The following emissions units at premise number 0546000117 are subject to 40 CFR Part 63, Subpart IIII, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:

- K001 (EDP Coating Line);
- K002 (Sealer/Deadner Coating Line);
- K003 (Guidecoat Line);
- K005 (Topcoat Line A);
- K006 (Topcoat Line B);
- K007 (Primary Topcoat On-Line Repair);
- K008 (Secondary Topcoat On-line Repair);
- K009 (Wax/Polish Coating Line);
- K011 Final Repair;
- K012 (Specialty Topcoat Coating and On-Line Repair);
- K013 (Assembly Miscellaneous Coating Line); and
- P006 (Process Welding).

The following emissions unit at premise number 0546000117 is subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and is, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:

- B035 (1135 HP emergency generator); and
- B409 (1232 HP generator).

The following emissions units at premise number 0546000117 are subject to 40 CFR Part 63, Subpart PPPP, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:



K015 (Plastic Coating Line);
P021 (Plastic Parts Miscellaneous Solvent Usage);
P020 (Plastic parts polish and repair); and
R005 (Injected Parts Coating Line).

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

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

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

- a) New installation of an emissions unit that emits a toxic air contaminant identified under OAC rule 3745-114-01;
- b) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound 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 pollutant with a listed TLV that was proposed in the application and 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":

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

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

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

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

9. Revisions to Best Available Technology (BAT) Limits During a 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 Plant-wide 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, record keeping, and reporting requirements for the BAT determination. The monitoring, record keeping, and reporting requirements shall be consistent with the monitoring, record keeping, 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, record keeping, and reporting selected to support the BAT determination.
- e) The BAT determination selected by the owner or operator, and its associated monitoring, record keeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.
- f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.9.b) through B.9.e), and the following paragraph, shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

10. New or Modified Emissions Unit BAT Reporting

Under OAC paragraph 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 paragraph 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.

11. The terms and conditions contained in this permit shall supersede the terms and conditions for premise 0546000117 in:

- Permit to Install (PTI) 05-03835 issued 5/16/1990 for emissions units B004, B005, and B006;
- PTI 05-06431 issued 8/12/2003 for emissions unit P018;
- PTI 05-07914 issued 7/24/1996 for emissions unit K018;
- PTI 05-07923 issued 01/08/2008, for emissions units K005, K006, K007, K008, K009, K011, K012, K013, P001, P002, P003, P004, P006, P014, P016, and P017;
- PTI 05-08339 issued 12/16/2003, for emissions units F096;
- PTI 05-09074 issued 6/3/1999 for emissions unit P023;
- PTI 05-10022 issued 5/19/1999, for emissions unit B007;
- PTI 05-10278 issued 12/18/2007, for emissions units K015 and P021;
- PTI 05-12466 issued 08/07/2003, for emissions units K024;
- PTI 05-13448 issued 11/30/2004, for emissions unit B035 and B409;
- PTI 05-14163 issued 11/17/2005, for emissions units P025, P026, and P027;
- PTI P0105010 issued 09/04/2009, for emissions units K002; PTI P0105436 issued 03/29/2010, for emissions units K001;
- PTI P0106341 issued 11/22/2010, for emissions units R005;
- PTI P0107966 issued 4/25/2011 for emissions unit B046;
- PTI P0109704 issued 05/14/2012, for emissions units K003; and
- PTI P0114841 issued 9/10/2013, for emissions unit P045.

12. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks (40 CFR Part 63, Subpart IIII) as an existing major source with a compliance date as specified in the final standard. The following



emissions units contained in this permit are subject to 40 CFR 63, Subpart IIII: K001, K002, K003, K005, K006, K007, K008, K009, K011, K012, K013, K018, P006, and P018. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA, Southwest District Office (SWDO).

13. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) as an existing major source with a compliance date specified in the final standard. The following emission units contained in this permit are subject to 40 CFR 63, Subpart PPPP: K015, P020, P021, and R005. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA, Southwest District Office (SWDO).

Because these emission units are co-located at an affected source subject to 40 CFR 63 Subpart IIII, the permittee has the option under 40 CFR 63.3082(c) for these units to be subject to 40 CFR Part 63, Subpart IIII. If the permittee decides to include one or more these emission units in the existing affected source subject to 40 CFR Part 63, Subpart IIII, the requirements of 40 CFR Part 63, Subpart PPPP will no longer apply to those emission units. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Southwest District Office (SWDO).

14. If the permittee elects to operate B035, B043, B044, B045, and/or B409as a new affected source other than a limited use RICE then all of the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply to the emissions unit(s).



Final Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0120917
Facility ID: 0546000117
Effective Date:9/1/2016

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Topcoat at ELP: K005 and K006

| EU ID | Operations, Property and/or Equipment Description |
|-------|---|
| K005 | Topcoat Line A |
| K006 | Topcoat Line B |

- 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., below.
- 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. | ORC 3704.03(T) | Emissions from the coating operation shall not exceed: 16.1 tons of volatile organic compound (VOC) per month average over a 12 month rolling period. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 1.429 tons of nitrogen oxide (NOx) per month average over a 12-month rolling period; and 2.278 tons of carbon monoxide (CO) per month average over a 12-month rolling period. |
| b. | OAC rule 3745-31-05(A)(3) June 30, 2008 | Emissions from the coating operation shall not exceed: 0.50 ton of particulate emissions (PE) per month average over a 12-month period. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| | | <p>0.0517 ton of particulate emissions per month averaged over a 12-month rolling period;</p> <p>0.0167 ton of sulfur dioxide (SO₂) (CO) per month averaged over a 12-month rolling period; and</p> <p>0.149 ton of volatile organic compound (VOC) per month averaged over a 12-month rolling period.</p> <p>See b)(2)g., below.</p> |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 | See b)(2)h., below. |
| d. | OAC rule 3745-31-05(E) (in order to minimize the allowable VOC emissions) | <p>Emissions from the coating operation shall not exceed:</p> <p>193.2 tons of volatile organic compound (VOC) per rolling 12-month period.</p> |
| e. | OAC rule 3745-31-32(F) | <p>The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} 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_x, CO, SO₂, GHG, PM, PM₁₀, and PM_{2.5} emissions from this facility as specified in B.3.</p> |
| f. | OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit) | Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule. |
| g. | OAC rule 3745-17-11(C)(3) | See b)(2) below. |
| h. | 40 CFR, Part 60, Subpart MM | 1.47 kgs of VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined). |
| i. | OAC rule 3745-21-09(C)(1)(c) | 15.1 lbs of VOC/gallon of applied solids, as a daily, volume-weighted average |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|--|
| | | (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined). |
| j. | OAC rule 3745-18-06(E) | See b)(2) below. |
| k. | OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit) | Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input. |
| l. | OAC rule 3745-17-07(A)(from the indirect-fired oven zones associated with this emissions unit) | Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. |
| m. | OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit) | See b)(2) below. |
| n. | OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit) | See b)(2) below |
| o. | 40 CFR Part 63 Subpart IIII | The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63. 3091, and should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. |

(2) Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- b. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and



control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

- d. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 95%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
- e. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.
- f. Additional natural gas combustion burners (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(B)(1)(a) are met and the total burner capacity for this emissions unit K005/K006 remains below 74.3 MMBTU/hr. The installation of additional natural gas burners to this emissions unit will not require a permit modification provided that the modifications to the emissions unit comply with the emission limitations for natural gas sources specified in b)(1). An accurate list of the natural gas combustion burners in this emissions unit shall be maintained by the facility and made available to Ohio EPA staff upon request.
- g. These BAT emissions 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).
- h. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(iii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- i. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. b)(1)a. thru c.;
 - ii. b)(2)g. and h.;
 - iii. c)(1) thru (3);
 - iv. d)(2) and (4);

- v. e)(1)a., b. and d.;
- vi. f)(1)b., c., and d; and
- vii. f)(2).

c) **Operational Restrictions**

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
- (4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.
- (5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for



"Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (2) The permittee shall maintain the following monthly records on all coating employed in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC emissions in tons per month, the sum of ("b." x "c.)/2000;
 - e. The VOC emissions in tons per 12 month rolling period, the sum of "d." plus previous 11 month total VOC emissions.

- (3) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
 - b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

- (4) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

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

- (6) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

- (7) If a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions,



recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;

- a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.
- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all instances when a fuel other than natural gas was burned in this emissions unit;
 - b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings
 - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
 - d. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

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

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
- a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
 - b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.



- (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
 - (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.
 - b. Emission Limitation:

Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:

1.429 tons of nitrogen oxide (NOx) per month average over a 12 month rolling period;

2.278 tons of carbon monoxide (CO) per month average over a 12 month rolling period;

0.0517 ton of particulate emissions per month averaged over a 12-month rolling period;

0.0167 ton of sulfur dioxide (SO₂) (CO) per month averaged over a 12-month rolling period; and

0.149 ton of volatile organic compound (VOC) per month averaged over a 12-month rolling period

The above allowable were determined based on the following information:

The tons per month average over a 12-month period allowable emission limitations above were established by multiplying the maximum natural gas



usage rate (563.268×10^6 cu.ft./12-month period) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98*.

Multiplying the maximum gas usage rate for uncontrolled burners (56.940×10^6 cu.ft./12-month period) by the emission factor for uncontrolled NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98*.

Multiplying the maximum gas usage rate to low-NOx burners (506.328×10^6 cu ft/12-month period) by the emission factor for low-NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98*:

- i. NOx, 100 lbs NOx/mm cu. ft.;
- ii. Low NOx, 50 lbs NOx/mm cu. ft.;
- iii. CO, 84 lbs CO/mm cu. ft.;
- iv. PM10, 1.9 lbs PE/mm cu. ft.;
- v. VOC, 5.5 lbs VOC/mm cu. ft.; and
- vi. SO2, 0.6 lb SO2/mm cu. ft.

The total emissions are then divided by 2,000 pounds per ton and then divided by 12 to produce the tons per month average over a 12-month rolling period allowable emission limitations.

Applicable Compliance Method:

Compliance shall be assumed based on information provided in the permit application and the use of low NOx burners air handler, the 12 mmbtu/hr oven burner, and thermal incinerator.

If required, the emission factors listed above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

c. Emission limitation:

16.1 tons of volatile organic compound (VOC) per month average over a 12-month rolling period.

The above limitation was established based on the following equation:

$$MER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)] \times [(8760/2000)/12]/2 \text{ lines}$$



Where:

MER = Monthly average emissions over a 12 month period, in tons;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator, in percent controlled, 95% (0.95).

Applicable Compliance Method:

The VOC emission limitation was established by summing the maximum potential VOC emissions (193.2 ton/yr) and dividing by 12 months per year. Compliance shall be assumed provided the total VOC emissions do not exceed 193.2 tons per rolling, 12-month period. Compliance shall be determined through the monthly recordkeeping specified in d)(2) above. Formulation data or U.S. EPA Method 24 shall be used to determine the properties of the materials.

d. Emission Limitations:

0.50 tons particulate emissions (PE) per month average over a 12 month period

The above allowable was established based on the following equation:

$$MER = \{[Mcu \times Hsc \times (1-Te)] \times (1- Ce)\} \times [(8760/2000)/12] / 2 \text{ lines}$$

Where:

MER = Monthly average emissions over a 12 month period, in tons;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

The PE emission limitation was established by summing the maximum potential PE emissions (6.0 ton/yr) and dividing by 12 months per year. Compliance shall be assumed provided the total PE emissions do not exceed 6.0 tons per rolling, 12-month period.



e. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

g. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Destruction rate efficiency testing shall be conducted within 180 days after process optimization has been achieved.

i. Process optimization will be achieved when:

(a) The finalization of robot spray programming and volume control is set for mass production units.

b. Destruction efficiency testing shall be conducted at least once every five years and at least four and half years apart, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

- c. The emission testing shall be conducted to demonstrate compliance with the 95% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit as specified in section f) of this permit and in accordance with OAC rule 3745-21-09(C)(4).
- d. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio



EPA, Southwest District Office's refusal to accept the results of the emission test(s).

- g. Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.
- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.
- g) Miscellaneous Requirements
 - (1) None.