



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

3/4/2009

Certified Mail

Stephen Fogle
Honda of America Mfg., Inc., Marysville Auto Plant
Marysville Automobile Plant
24000 Honda Parkway
Marysville, OH 43040-9251

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0104403
Permit Type: Administrative Modification
County: Union

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Journal Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

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

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

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-CDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Honda of America Mfg., Inc., Marysville Auto Plant

Issue Date: 3/4/2009
Permit Number: P0104403
Permit Type: Administrative Modification
Permit Description: Admin Mod for Line 1 Liquid Applied Sound Deadening Operation. This permit supercedes PTI 01-12057.
Facility ID: 0180010193
Facility Location: Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway,
Marysville, OH 43040-9251
Facility Description: Automobile Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Natalie Parsons at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104403
Facility ID: 0180010193

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Honda Manufacturing in Marysville manufactures vehicles on two assembly lines and has numerous other various assemblies and processes. The facility requests changes to lower the allowable for pounds of VOC per gallon and tons per year of the Line 1 Liquid Applied Sound Deadening Operation that is included in this permit, P0104403. This unit, K240, was previously permitted in PTI 01-12057.

3. Facility Emissions and Attainment Status:

Honda is a TV facility for VOCs.

4. Source Emissions:

The aforementioned emission units have a limit of 0.18lbs VOC/gal and 34.0 tons per year of VOCs.

5. Conclusion:

This emission unit was previously permitted at almost double the emissions that are presently being requested. This unit is also subject to MACT IIII- Surface Coating of Auto and Light Duty Trucks

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>34.0</u>



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID: 0180010193
Permit Number: P0104403
Permit Type: Administrative Modification
Issued: 3/4/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

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State of Ohio Environmental Protection Agency
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Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104403

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0180010193

Facility Description: Motor Vehicles and Car Bodies

Application Number(s): A0036522

Permit Number: P0104403

Permit Description: Admin Mod for Line 1 Liquid Applied Sound Deadening Operation. This permit supercedes PTI 01-12057.

Permit Type: Administrative Modification

Permit Fee: \$100.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 3/4/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104403

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104403

Permit Description: Admin Mod for Line 1 Liquid Applied Sound Deadening Operation. This permit supersedes PTI 01-12057.

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

Emissions Unit ID:	K240
Company Equipment ID:	K240 (LASD Line 1)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104403

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.

- c) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) 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).

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 party 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 through completion of the annual PER covering the last period of operation 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 PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online 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 (i.e., postmarked), 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 Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

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.



State of Ohio Environmental Protection Agency
State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104403

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. This evaluation was conducted to determine whether the proposed new project to install K240: Line 1 Liquid Applied Sound Deadening application, previously permitted in PTI 01-12057 and administratively modified in permit P0104403 constitutes a Major Modification as defined by OAC rule 3745-31-01(JJJ).

The following tables include all emissions units at the Honda of America, Mfg. Inc. (HAM) plant that are being used to demonstrate a net decrease in VOC emissions for the entire facility. HAM consists of the East Liberty Auto Plant (ELP), the Marysville Motorcycle Plant (MMP), and the Marysville Auto Plant (MAP). The contemporaneous time period begins five years prior to the start of the construction project, 11/22/2001, and ends at commencement of operation, 03/01/2007.

Significant Modification Evaluation:

Objective: Determine if the permitting action proposed under PTI 01-12057 and administratively modified in permit P0104403 (K240: Line 1 Liquid Applied Sound Deadening application) constitutes a Major Modification as defined by OAC rule 3745-31-01(JJJ).

Methodology: In accordance with OAC rule 3745-31-01(TTT), one must use the following procedure for installation of new units.

- a) Step 1. Calculate whether a significant emissions increase will occur.
 - (1) Calculate the sum of the difference between the potential to emit (PTE) from each new emissions unit following completion of the NSR project and the baseline actual emissions of these units before the NSR project. [OAC rule 3745-31-01(JJJ)(4)(b)]

**Table I:
 New Emissions Units -
 potential to emit minus baseline actual*
 (for this project-within past 12 months)**

Emission Units (EU)	EU Description	PTE following completion (VOC tons/yr)
K240	Line 1 Liquid Applied Sound Deadening application	93.1*
Total emissions increases for new or modified emissions units (project as defined within past 12 months) (tons)		93.1 tons VOC/yr

* PTE is based on the maximum hourly emission rate of 21.3 lbs VOC multiplied by 8760 hours per year and divided by 2000 lbs per ton. The PTE does not take into account any federally enforceable operational restrictions at the facility.

- (2) If the values are greater than the significance level for the pollutants in question, then a significant emissions increase will occur. (Based upon Table II, a Significant Modification will occur.)



Table II: Summary Table

	VOC (tons/yr)
New Emissions Unit	93.1
Trigger Levels	40
Significant Emissions Increase?	Yes

- b) Step 2. Calculate whether a net emissions increase will occur.
 - (1) With respect to any regulated NSR pollutant emitted by a major stationary source, the amount by which the sum of (1) an increase in emissions; and (2) contemporaneous increases/decreases, exceeds zero. [OAC rule 3745-31-01(TTT)] The "2 yr Average Actual" is the Baseline Actual. [OAC rule 3745-31-01(O)]



**Table III:
 Contemporaneous Increases/Decreases and Shutdowns during 5 year period**

Plant*	Emissions Unit(s) ID	Source Description	Permit No.	Date of PTI / Change Date / Shutdown	Change Date Type	Baseline Years	Avg 2 Yr Actual Emissions (VOC tpy)	PTE / Projected Actual (VOC tpy)	Emissions Difference (VOC tpy)
MMP	K404	Line 4	01-8456	12/18	PTI DATE	1998, 1999	46	85.9	39.90
MMP	K404- burner	Line 4 burner	01-8456	12/18	PTI DATE			0.06 (0.552)	0.00
MAP	R200, R201, R202, R203, R204 (was R301, R302, R303, P301, P303)	POPA Coating Line	01-8167 (was 01-999)	01/01	EMISSIONS CHANGE	1998, 1999	186.28	107.00	-79.28
MAP	R200, R201, R202, R203, R204 (was R301, R302, R303, P301, P303)	POPA burners	01-8167	01/01	EMISSIONS CHANGE		0.00	0.79	0.79
MAP	P304	OBL Sludge Pits	01-6648, 01-8282	02/01	SHUTDOWN	2000, 2001	1.0925	0	-1.09
MAP	K001	Civic pad machine	01-6380	03/01	SHUTDOWN	1998, 1999	34.735	0	-34.74
MAP	R013, R014, R015, P013, P015	OBL Coating Line	01-512	03/01	SHUTDOWN	1998, 1999	56.58	0	-56.58
MAP	K227, K228	Black Out	01-8502	03/07	EMISSIONS CHANGE	New Source	0.00	10.00	10.00
MAP	K214	Black Wax	01-6743	04/01	SHUTDOWN	1998, 1999	97.235	0	-97.24
MAP	R205	IP Painting	01-8376	06/18	EMISSIONS CHANGE	New Source	0.00	14.00	14.00
MAP	R205	IP Painting burners	01-8376	06/18	EMISSIONS CHANGE	New Source	0.00	0.17	0.17
MAP	Z330	4.5 MMBtu/hr - '02TV Mod	exempt	06/30	PTI DATE		0	0.11	0.11
MAP	Z331	4.5 MMBtu/hr - '02TV Mod	exempt	06/30	PTI DATE		0	0.11	0.11
MMP	K401	Line 1	01-8584	08/27	PTI DATE	1998, 1999	14.75	54.4	39.65
MMP	K401 - burner	Line 1 burner	01-8584	08/27	PTI DATE			0.25	0.00
MAP	P005, P200	Weld Sealer	01-8541	02/12	EMISSIONS CHANGE	2000, 2001	5.42	18.00	12.58
ELP	K024	LASD (Spray Melt Sheet)	05-12466	03/04	PTI DATE	2001, 2002	0	28.7	28.70
ELP	P025, P026	Injection Machine PTI	05-12753	09/25	PTI DATE		0	5.81	5.81
MAP		Pond Fire Pumps	exempt	12/01	PTI DATE		0.06	0.57	0.51



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MAP		West Logistics AHU's	exempt	06/30	PTI DATE	New Source	0.00	0.40	0.40
MMP		ISG Generator		01/01	PTI DATE		0	0.03	0.03
MMP	P417	New Injection Machine	01-8875	01/13	PTI DATE	NA	0	4.3	4.30
MAP	B065, B066	Emergency Generators	01-8883	02/15	PTI DATE	New Source	0.00	1.00	1.00
ELP	K002	Sealer/Deadener	05-13872	06/09	PTI DATE	2002, 2003	9.71	26.1	16.39
MAP	K235	New L2 ECoat	01-8782	07/15	EMISSIONS CHANGE	NA		24.36	24.36
MAP	K235, K238, K236, K237, P342, P343, P344, K239	Combustion Sources	01-8782	07/15	EMISSIONS CHANGE	NA		2.19	2.19
MAP	K002	L2 E-Coat	01-6743	08/01	SHUTDOWN	2002, 2003	22.20	0	-22.20
MAP	K238	New L2 LASD	01-8782	09/01	EMISSIONS CHANGE	NA		32.76	32.76
MAP	K238	New L2 Sealer/Deadner	01-8782	09/01	EMISSIONS CHANGE	NA		24.55	24.55
MAP	R002	L2 Sealer/Deadner	01-6743	09/09	SHUTDOWN	2003, 2004	22.69	0	-22.69
MAP	P345	New Injection Machine	01-8894	11/15	EMISSIONS CHANGE	NA	0.00	3.70	3.70
ELP	P027	Injection Machine PTI	05-14163	11/17	EMISSIONS CHANGE	NA	0	2.57	2.57
MAP	K236	New L2 PrimerSurfacer	01-8782	11/26	EMISSIONS CHANGE	NA		225.10	225.10
MAP	K237	New L2 Topcoat	01-8782	11/26	EMISSIONS CHANGE	NA		196.27	196.27
MAP	K239	L1/L2 Polish	01-8782	11/26	EMISSIONS CHANGE	NA		2.10	2.10
MAP	P341	Line 2 Sludge Pit	01-8782	11/26	EMISSIONS CHANGE	NA		10.56	10.56
MAP	P342	New L2 ecoat sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00
MAP	P343	New L2 Surfacer Sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00
MAP	P344	New L2 On-line Repair Sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00
MAP	K003	L2 Primer Surfacer	01-6743	12/20	SHUTDOWN	2003, 2004	168.45	0	-168.45
MAP	K004	L2 Topcoat	01-6743	12/20	SHUTDOWN	2003, 2004	403.69	0	-403.69
MAP	K232/K233	L1/L2 Polish	01-8658	12/20	SHUTDOWN	2001, 2002	0.36	0	-0.36
MAP	P006	Paint Mix	01-6743	12/20	SHUTDOWN	2001, 2002	0.00	0	0.00
MAP	P103	L2 Ecoat sanding	01-6743	12/20	SHUTDOWN	2001, 2002	0.00	0	0.00
MAP	P306	Sludge Pit	01-6647	12/20	SHUTDOWN	2001, 2002	0.42	0	-0.42
MAP	P102	L2 P/S Sanding	01-6743	02/01	SHUTDOWN	2001, 2002	0.00	0	0.00



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MAP	NA	1900 U/D Market Flexibility (new oven burner)	NA	08/01	EMISSIONS CHANGE	2002, 2003	774.83	775.40	0.57
MAP	NA	L1/L2 Misc Purge	01-6743	No change to source. Not shutdown.					0.00
MAP	K227, K228	L1/L2 Blackout	01-8502	No change to source. Not shutdown.					0.00
MAP	R003	L2 Inner Wax	01-6743	No change to source. Not shutdown.					0.00
MAP	B039	FA-AH-49 - Air Handler	01-3194				0	0	0.00
MAP	X108	Combustion Sources	Varies						0.00
Total net emissions increases/decreases									-187.53

* MMP = Marysville Motorcycle Plant, MAP = Marysville Auto Plant, ELP = East Liberty Plant



**Table IV:
Summary Table - sum of Table II and Table III**

	(VOC tons/yr)
Significant Emissions Increase	93.1
Contemporaneous Increases/Decreases	-187.5
Total Significant Net Emissions Increase	-94.4
Trigger Levels	40
Significant Net Emissions Increase?	No

This project will not result in a major modification because the NSR project does not cause a significant emissions increase or a significant net emissions increase. None-the-less, the permittee is proposing to accept synthetic minor limits for this project.

**Table V:
Synthetic Minor Limitations***

Emissions Unit (EU)	Description	VOC PTE (tons/yr)	
		Pre	Post
K240	Line 1 Liquid Applied Sound Deadening application	63.5	34.0
Total Synthetic Minor Limitations		-	34.0
Contemporaneous Increases/Decreases		-	-187.5
Total Increase		-	-153.5
Trigger Levels		-	40
Significant Net Emissions Increase AFTER Synthetic Minor restrictions?		-	No

* "Post" emission rates listed above are based upon the federally enforceable allowable emission rate, not the projected actual.

**Table VI:
Summary Table - Final Determination**

	(VOC tons/yr)
Total Permitting Action without Synthetic Minor	93.1
Total Permitting Action with Synthetic Minor	34.0
Total Significant Net Emissions Increase with Synthetic Minor	-153.5
Significance Levels	40
Significant Increase from Permitting Action?	No



Therefore this project will not result in a major modification because the NSR project does not cause a significant emissions increase.

3. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR Part 63, Subpart IIII upon promulgation of the final standard. On February 26, 2004, the U.S. EPA issued the final Subpart IIII. This new standard applies to the Honda of America Mfg., Inc. (Honda) facility and the emissions units included in this permit.
4. The permittee is subject to the rules of the Subpart IIII MACT standard as an existing major source with a compliance date as specified in the final standard. As specified in the Subpart, the permittee shall submit the following notifications:
 - (1) Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
 - a. the name and mailing address of the permittee;
 - b. the physical location of the source if it is different from the mailing address;
 - c. identification of the relevant MACT standard and the source's compliance date;
 - d. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
 - e. a statement confirming the facility is a major source for HAPs.
 - (2) Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
 - a. the methods used to determine compliance;
 - b. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;
 - e. an analysis demonstrating whether the affected source is a major source or an area source;



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- f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- g. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.



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C. Emissions Unit Terms and Conditions



1. K240, K240 (LASD Line 1)

Operations, Property and/or Equipment Description:

Line 1 Liquid Applied Sound Deadening Operation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the liquid applied sound deadening (LASD) employed in this emissions unit shall not exceed 0.18 lb/gallon. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D).
b.	OAC rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid PSD)	See Section c)(1) and c)(2) below.
d.	OAC rule 3745-31-28	See Section b)(2)b. below.
e.	40 CFR Part 63, Subpart IIII (63.3091-3164)	Table 2 to Subpart IIII of 40 CFR Part 63- Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.3091-3164 apply.

(2) Additional Terms and Conditions

a. Emissions unit K240 consists of robotic material applicators, associated material storage and transfer equipment and shares the primer-surfacer/LASD oven with K206. The primer-surfacer/LASD oven (K206) is currently permitted under PTI 01-6743, issued on 03/09/06.



b. This emissions unit is subject to the MACT requirements specified in 40 CFR Part 63, Subpart IIII.

c) Operational Restrictions

- (1) The emissions of VOC from this emissions unit shall not exceed 34.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- (2) The maximum number of units (vehicles) processed through K240 shall not exceed 245,000 units per rolling 12-month period based upon a rolling 12-month summation of production rates, measured at Paint-off.

The coating line (Line1) that this emissions unit will be a component of has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the number of units (vehicles), upon issuance of this permit.

- (3) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3091-3164)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each coating, as applied;
 - b. the VOC content of each coating as applied, in lbs/gallon;
 - c. the number of gallons of each coating employed;
 - d. the rolling 12-month summation of voc emissions, in tons.
 - e. the total production rate, in units (vehicles)/month; and
 - f. the rolling, 12-month production rate, in units (vehicles).

- (2) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3091-3164)

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated VOC emissions exceedance of the LASD emission limitation of 34.0 tons/rolling, 12-month period;
 - b. all monthly records showing an exceedance of the rolling, 12-month vehicle production limitation of 245,000 units.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Section A of the General Term and Conditions.



- (2) The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
 - (3) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the VOC emission rates of 0.18 lb/gal. Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.
 - (4) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3091-3164)
- f) Testing Requirements
- (1) Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.18 lb VOC/gal

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirements specified in Section d)(1) above.
 - b. Emission Limitation:
34.0 tons VOC/ rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the record keeping specified in Section d)(1) above.
 - (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.
- g) Miscellaneous Requirements
- (1) This permit supersedes the permit PTI 01-12057 issued on November 21, 2006.