State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

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

6/2/2009

Certified Mail

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

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180000156
Permit Number: P0104447
Permit Type: OAC Chapter 3745-31 Modification
County: Union

Dear Permit Holder:

Enclosed please find a final 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.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Central District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

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

Facility ID: 0180000156
Permit Number: P0104447
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/2/2009
Effective: 6/2/2009

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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

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Authorization

Facility ID: 0180000156
Facility Description: Car and body engines - testing laboratory
Application Number(s): A0036741
Permit Number: P0104447
Permit Description: Chapter 31 Mod for twelve dynamometers to increase maximum fuel usage to 60 gal/hr.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $2,400.00
Issue Date: 6/2/2009
Effective Date: 6/2/2009

This document constitutes issuance to:

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

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

Ohio 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

Authorization (continued)

Permit Number: P0104447
Permit Description: Chapter 31 Mod for twelve dynamometers to increase maximum fuel usage to 60 gal/hr.

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

Group Name: Dynamometers

Emissions Unit ID:	**B013**
Company Equipment ID:	Performance Dynamometer (Rm. 101)
Superseded Permit Number:	01-08447
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B014**
Company Equipment ID:	Performance Dynamometer (Rm. 103)
Superseded Permit Number:	01-08447
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B015**
Company Equipment ID:	Durability Dynamometer (Rm. 105)
Superseded Permit Number:	01-08447
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B027**
Company Equipment ID:	Engine Testing Dynamometer, Bldg 5, Room 100B
Superseded Permit Number:	01-08719
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B031**
Company Equipment ID:	Durability Dynamometer
Superseded Permit Number:	01-01345
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B032**
Company Equipment ID:	Performance Dynamometer
Superseded Permit Number:	01-01345
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B033**
Company Equipment ID:	Durability Dynamometer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B035**
Company Equipment ID:	Trans. Dyno VSDI
Superseded Permit Number:	P0104140
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B036**
Company Equipment ID:	Trans. Dyno VSDII
Superseded Permit Number:	P0104140
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B037**
Company Equipment ID:	Trans. Dyno VSDIII
Superseded Permit Number:	P0104140
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B038**
Company Equipment ID:	Trans. Dyno VSDIV
Superseded Permit Number:	P0104140
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B039**
Company Equipment ID:	Durability Bench Dyn

Superseded Permit Number:	P0104142
General Permit Category and Type:	Not Applicable

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.

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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Dynamometers: B013, B014, B015, B027, B031, B032, B033, B035, B036, B037, B038, B039,

EU ID	Operations, Property and/or Equipment Description
B013	Performance Dynamometer, engine testing w/ incincerator control, Bldg. 5, Room 101
B014	Performance Dynamometer, engine testing w/ incincerator control, Bldg. 5, Room 103
B015	Durability Dynamometer, engine testing w/ incincerator control, Bldg. 5, Room 105
B027	engine testing dynamometer in Building 5
B031	Durability Dynamometer 13-121 (One AVL Cradle Mounted Dyno With Hydrostatic Option: Model: DynoExact APA 302/10 PO)
B032	Performance Dynomometer 5-103 (One AVL Cradle Mounted Dyno with Hydrostatic Option: Model DynoExact APA 302/10 PO)
B033	Durability Dynamometer
B035	Building 14 - Transmission Dynamometer 1
B036	Building 14 - Transmission Dynamometer 2
B037	Building 14 - Transmission Dynamometer 3
B038	Building 14 - Transmission Dynamometer 4
B039	Building 13 - Durability Bench Dynamometer 1

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.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(b)	See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations: 7.04 lbs of carbon monoxide (CO)/hr 30.86 tons of CO/yr 4.48 lbs of organic compound (OC)/hr 19.64 tons of OC/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rules 3745-17-07(A), OAC rule

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3745-17-11(B)(5) and 3745-21-08(B).
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid PSD.)	249 tons CO per year based on rolling, 12-month summation. See b)(1),(2) and (3) below
d.	OAC rule 3745-21-08(B)	See b.(2)b. below.
e.	OAC rule 3745-17-07(A)	See b.(2)d. below
f.	OAC rule 3745-17-11(B)(5)	0.31 pound per million Btu of actual heat input for a stationary small internal combustion engine.
g.	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) does not apply to PE, NO_x and SO_2 emissions from this air contaminant source since the uncontrolled potential to emit for PE, NO_x and SO_2, are less than ten tons per year.

b. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c. The CO and OC emission limitation specified in b)(1)b. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this emission limitation.

d. This emissions unit is exempt from the visible particulate emission 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.

e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(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, as defined in OAC rule 3745-17-01(B)(14) is equal to zero.

c) Operational Restrictions

(1) The facility wide usage of natural gas in the emission units as listed in term b)(5) below shall not exceed 250,000,000 standard cubic feet per year, based upon a 12-month rolling summation.

(2) The facility wide usage of gasoline in the uncontrolled dynamometer cells including the following emissions units HTD Building #7 (B012), Emissions Dynamometer Building #5 (B017), B018, Hot Cold Chamber HCC1 Building #7 (B021), 4 Wheel Dynamometer Building #7 (B022), Emissions Dynamometer II Building #5 (B023), Hot Cold Chamber HCCII Building #7 (B024), FR Dynamometer Building #7 (B025), ATV Dynamometer Building #13 (B026), Run Loss Dynamometer Building #5 (B028), HTD II Building #7 (B030), Emissions Dynamometer IV Building #5 (B034), B040, B041, and the ATV Dynamometer IV Building #5 shall not exceed 100,000 gallons per year, based upon a 12-month rolling summation.

(3) The facility wide usage of gasoline in the controlled dynamometer cells (B013-B016, B019, B027, B029, B031-B033 and B035 - B039) shall not exceed 540,000 gallons per year, based upon a 12-month rolling summation.

(4) Emissions from this emissions unit shall be vented to a thermal incinerator or alternative control device with a minimum 98% destruction efficiency, when the emissions unit is in operation.

(5) Facility wide emissions units at this facility are: B001, B005 through B042, G001, F001, K001, K002, K004, P005, P006, and includes the following exempt emissions units: HTD Building #7(B012), Emissions Dynamometer Building #5 (B017), Hot Cold Chamber HCC1 Building #7 (B021), 4 Wheel Dynamometer Building #7 (B022), Emissions Dynamometer II Building #5 (B023), Hot Cold Chamber HCCII Building #7 (B024), RF Dynamometer Building #7 (B025), ATV Dynamometer Building #13 (B026), Run Loss Dynamometer Building #5 (B028), HTD II Building #7 (B030), Emissions Dynamometer IV Building #5 (B034), and ATV Dynamometer II.

(6) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, monthly summation of natural gas and gasoline usage.

d) Monitoring and/or Recordkeeping Requirements

(1) If an alternative emission control device is employed, the permittee shall develop and submit to Ohio EPA (if requested) an operational manual within 30-days of commencing operation of this emission unit. The permittee shall operated and maintain the alternative control device according to manufacturer's specifications.

(2) The permittee shall maintain monthly records of the following information facility wide for the emissions units listed in b)(5) above:

a. the total natural gas usage;

b. the total gasoline usage in uncontrolled emissions units;

c. the total gasoline usage in controlled emissions units;

d. the rolling, 12-month summation of natural gas usage;

e. the rolling, 12-month summation of gasoline in uncontrolled emissions units;

f. the rolling, 12-month summation of gasoline in controlled emissions units; and

g. the calculated CO emissions rate for all the emissions units as a rolling, 12-month summation.

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(4) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and the operating manuals. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years

(5) If an alternative emissions control device is employed, the permittee shall collect and record:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation; and

b. Any deviations (as defined in the operations manual) from the operating parameters that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance. The operating parameters used to demonstrate compliance should be approved by the Ohio EPA, Central District Office.

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total emissions of CO and OC from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

(2) The permittee shall submit quarterly summaries that identify:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;

b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, or the monitoring equipment when the emissions unit(s) was/were in operation; and

These reports shall be submitted in accordance with the reporting requirements specified in the Statndard Terms and Conditions of this permit.

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

a. the rolling, 12-month summation of natural gas usage.

b. the rolling, 12-month summation of gasoline in uncontrolled emissions units;

c. the rolling, 12-month summation of gasoline in controlled emissions units; and

d. the calculated CO emissions rate as a rolling, 12-month summation.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

7.04 lbs of CO/hr and 30.86 tons of CO/yr

Applicable Compliance Method:

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 3940 lb CO/1000 gal of gasoline and a maximum gasoline usage of 60 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System (FIRE6.01) for criteria pollutants using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly

emission rate (3.87 lbs/hr) by 8760 hours per year and dividing by 2000lbs per ton.

Uncontrolled emissions shall be calculated as follows:

hourly emissions: 3940 lb CO/1000 gal x 60 gal/hr = 236.4 lbs of CO/hr

fugitive emissions: 236.4 lbs of CO/hr x (1-.99) = 1.30 lbs of CO/hr

stack emissions: 236.4 lbs of CO/hr x (1-.98) = 4.73 lbs of CO/hr

annual emissions: 3940 lb CO/ 1000 gal x 60 gal/hr x 8760 hrs/yr x 1 ton/2000 lbs = 1035.4 tons per year

fugitive emissions (after control): 1035.4 ton of CO/yr x (1-.99) = 10.35 ton of CO/yr

stack emissions (after control): 1035.4 ton of CO/yr x (1-.98) = 20.70ton of CO/yr

The permittee shall conduct, or have conducted, emission testing for emissions units B035, B036, B037, and B038 in accordance with the following requirements:

i. The emission testing shall be conducted after installation of the final emission unit in Building 14 and within 60 days after achieving the maximum production rate at which the emission units will be operated, but not later than 180 days after initial startup of the final emission unit.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO. This limitation includes both fugitive and stack emissions (fugitive emissions are assumed to be 1% based on emissions testing conducted on similar emissions unit B027 on May 11-13, 2004).

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10. Alternative ISAPI-approved test methods may be used with prior approval from the Ohio EPA.

iv. 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, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(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 the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central 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.

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, Central 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, Central District Office.

b. Emission Limitation:

4.48 lbs of OC hr and 19.64 tons of OC/yr

Applicable Compliance Method:

The maximum uncontrolled hourly organic compound emissions were established using an emission factor of 148 lb OC/1000 gal of gasoline and a maximum gasoline usage of 60 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System

(FIRE6.01) for criteria pollutants using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly emission rate (2.47 lbs/hr) by 8760 hours per year and dividing by 2000lbs per ton.

Uncontrolled emissions shall be calculated as follows:

hourly emissions: 148 lb OC/1000 gal x 60 gal/hr = 8.88 lbs of OC/hr

fugitive emissions: 8.88 lbs of OC/hr x (1-.99) = 0.09 lbs of OC/hr

stack emissions: 8.88 lbs of OC/hr x (1-.50) = 4.44 lbs of OC/hr

annual emissions: 148 lb OC/ 1000 gal x 60 gal/hr x 8760 hrs/yr x 1 ton/2000 lbs = 38.89 tons per year

fugitive emissions (after control): 38.89 ton of OC/yr x (1-.99) = 0.39 ton of OC/yr

stack emissions (after control): 38.89 ton of OC/yr x (1-.50) = 19.45 ton of OC/yr

If required, the permittee shall demonstrate compliance with the hourly organic carbon emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 25A.

c. Emission Limitation:

0.31 lbs particulate/mmBtu.

Applicable Compliance Method:

The emission limit of 0.310 lbs particulate/mmBtu was determined using the emission factor from AP-42, 5th edition, Table 3.31 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.

If required, the permittee shall demonstrate compliance with the hourly particulate emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

d. Emission Limitation

249 tons CO per year rolling, 12-month

Applicable Compliance Method:

Compliance shall be determined by the record keeping specified in d)(2)above.

g) Miscellaneous Requirements

(1) None.