



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

6/30/2010

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
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0105664
Permit Type: Administrative 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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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 Kevin Boyce," 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
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 can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,


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

Cc: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID: 0180010193
Permit Number: P0105664
Permit Type: Administrative Modification
Issued: 6/30/2010
Effective: 6/30/2010



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

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Authorization

Facility ID: 0180010193

Facility Description: Motor Vehicles and Car Bodies

Application Number(s): M0000596, M0000615

Permit Number: P0105664

Permit Description: This permit is an administrative modification of PTI Nos. 01-06635 and 01-05165 to adjust the tracking of the purge/cleanup solvent usage and recovery for the Application Testing Facility and the Material Test Lab.

Permit Type: Administrative Modification

Permit Fee: \$400.00

Issue Date: 6/30/2010

Effective Date: 6/30/2010

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



Authorization (continued)

Permit Number: P0105664
Permit Description: This permit is an administrative modification of PTI Nos. 01-06635 and 01-05165 to adjust the tracking of the purge/cleanup solvent usage and recovery for the Application Testing Facility and the Material Test Lab.

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

Emissions Unit ID:	K011
Company Equipment ID:	PA Automotive Test Facility
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R016
Company Equipment ID:	PA Material Test Lab (MTL)
Superseded Permit Number:	
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 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) 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 by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying 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.

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 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 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 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.

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. K011, PA Automotive Test Facility

Operations, Property and/or Equipment Description:

Application Testing Facility (ATF) coating operations with natural gas drying burners and electric drying oven

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

(1) d)(5).

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)	<p>The organic compound (OC) content of coatings and reducing solvents shall not exceed 4.6 pounds OC per gallon (lbs OC/gal) as a monthly, volume-weighted average.</p> <p>Particulate emissions (PE) from coating overspray shall not exceed 0.55 ton per year (ton/yr).</p> <p>The emissions from the natural gas drying oven shall not exceed:</p> <p>0.04 lb PE/hr 0.18 ton PE/yr 2.16 lbs NO_x/hr 9.46 tons NO_x/yr 1.81 lbs CO/hr 7.95 tons CO/yr 0.01 lb SO₂/hr 0.06 ton SO₂/yr 0.12 lb OC/hr 0.52 ton OC/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section c)(2) below.
b.	OAC rule 3745-31-05(D)	OC emissions shall not exceed 13.4 tons OC per rolling, 12-month period from the coating operations. The net coating material usage shall not exceed 5,290 gallons per rolling, 12-month period (in any combination of waterborne or solvent borne coatings). See Section d)(2) below.
c.	OAC rule 3745-21-07(G)(9)	Exempt from the limitations in 3745-21-07(G)(2) by using only nonphoto-chemically reactive materials or material exempt under 3745-21-07(G)(9) when coating plastic parts. See Section c)(3) below.
d.	OAC rule 3745-21-09 (U)(2)(f)	Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
e.	OAC rule 3745-17-11(B)(1)	PE from coating overspray shall not exceed 0.551 lb/hr.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

- a. In order to test the spray applicator's effect, coatings being tested in ATF can be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of ATF test coatings in the Final Repair paint booth as part of the emissions calculated for this emissions unit.
- b. All clean-up and purge materials associated with this emissions unit shall be included under PTI P0105434, as stated below:
 - i. Air emissions from cleanup/purge material usage from this emission unit shall be recorded, maintained, calculated for recovery emissions credit, reported and considered covered under and included in emissions estimations completed for demonstrating compliance with the emissions limitation specified under Section C.1.b)(2)c. of PTI P0105434.

c) Operational Restrictions

- (1) For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (gallons/rolling twelve-months) and OC emissions shall be calculated based upon the actual coating usage and OC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
- (2) The permittee shall operate the downdraft/scrubber control whenever spray coating is applied to this emissions unit.
- (3) To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials shall be applied to non-metal, in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of the company identification for each coating, purge, and cleanup material employed, and documentation to show each to be either photochemically reactive or nonphotochemically reactive.
- (2) The permittee shall collect and record the following information each month for this emissions unit, for the purpose of determining rolling, 12-month material usage and emissions, and documentation that only non-PRM materials are applied to non-metal:
 - a. the name and identification of each coating and reducing solvent employed and the material(s) to which they are/were employed (metal/non-metal);
 - b. the OC content and the number of gallons of each coating and reducing solvent applied;
 - c. the monthly volume-weighted average OC content of all coatings and reducing solvents applied, calculated as specified in Section f)(1)b;
 - d. the calculated total organic compound emission rate for all coatings and reducing solvents, in pounds per month;
 - e. the total rolling, 12-month usage of coatings and reducing solvents in gallons; and
 - f. the total rolling, 12-month OC emissions from all coatings and reducing solvents, in tons.

Twelve month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations from the emissions unit to the previous 11 month's emission calculation.

- (3) Monthly usage of clean-up and purge materials shall be collected and recorded in accordance with the requirements of clean-up and purge materials in PTI P0105434.

Recovery of these materials is included in the record keeping requirements for the recovery tank in PTI P0105434.

- (4) The permittee shall maintain daily records that document any time periods when the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.
- (5) The permit to install for this emissions unit (K011) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: n-Butyl Acetate

TLV (mg/m³): 152 mg/m³

Maximum Hourly Emission Rate: 1.123 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 20.16 ug/m³

MAGLC : 16,976 ug/m³ for n-Butyl Acetate, 3,619 ug/m³ for lowest TLV toxic over 1 ton/year.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all periods of time in which a photochemically reactive material is applied to non-metal in this emission unit. These reports shall be submitted within 30 days after the occurrence and shall include an identification of the material, the amount, the day(s), and the duration of time the material was applied to the non-metal part(s).
- (2) The permittee shall notify the Ohio EPA Central District Office of any record showing that the downdraft/scrubber system was not in service when spray coating was applied in this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.
- (3) The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year, and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any record of an exceedance of the monthly volume-weighted average OC content of 4.6 pounds per gallon of coating and reducing solvent; and
 - b. any record of an exceedance of the rolling, 12-month OC emission limitation and/or material usage limitation.

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

- (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 emission limitations contained in this permit shall be determined in accordance with:
- a. Emission Limitation:
- 13.4 tons OC per rolling 12 months
- Applicable Compliance Method:
- Compliance with the rolling, 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping, as specified in Section d)(2).
- b. Emissions Limitation:
- 4.6 lbs OC per gallon of coating and reducing solvent as a monthly, volume weighted average
- Applicable Compliance Method:
- Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in d)(2). Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the OC content of the coatings, to be used in the calculation of emissions. The monthly volume weighted average OC content shall be calculated and summed, for each coatings and reducing solvent applied during the month, as follows:
- $$[(\text{lbs OC}/1 \text{ gal of coating}) \times (\text{gal of coating}) / (\text{gal of coating} + \text{gal of reducing solvent})] + [(\text{lbs OC}/1 \text{ gal of reducing solvent}) \times (\text{gal of reducing solvent}) / (\text{gal of coating} + \text{gal of reducing solvent})]$$
- c. Emission limitation from natural gas drying oven
- 0.04 lb PE/hr
0.18 ton PE/yr
2.16 lbs NO_x/hr
9.46 tons NO_x/yr
1.81 lbs CO/hr
7.95 tons CO/yr
0.01 lb SO₂/hr
0.06 ton SO₂/yr
0.12 lb OC/hr
0.52 ton OC/yr.

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from the drying ovens (21,600 ft³/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emission Limitation:

0.551 lb PE/hour from coating overspray

Applicable Compliance Method:

Daily compliance with this limit shall be based on maintaining the requirements for the downdraft/scrubber control equipment found in Sections c)(2), d)(4), and e)(3). If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

e. Emission Limitation:

0.55 ton PE/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the downdraft/scrubber control equipment specified under Sections c)(2), d)(4), and e)(3), and meeting the 5,290 gallons per rolling 12 months coating usage limit.

f. Emission Limitation:

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



2. R016, PA Material Test Lab (MTL)

Operations, Property and/or Equipment Description:

Materials Test Lab (MTL) coating operations with electric drying oven (modification)

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) d)(5), d)(6), and d)(7).

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 total coating usage shall not exceed 10 gallons per day when coating metal parts. Particulate emissions (PE) from overspray shall not exceed 0.58 ton/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), 3745-21-07(G), 3745-21-09(U), and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Organic compound (OC) emissions shall not exceed 12.0 tons per rolling, 12-month period from the coating operations. The net coating usage shall not exceed 4,690 net gallons per rolling, 12-month period (in any combination of waterborne or solvent borne coatings).
c.	OAC rule 3745-21-07(G)	See Section b)(2)c below.
d.	OAC rule 3745-21-09 (U)	Pursuant to OAC rule 3745-21-09(U)(2)(e)(ii), this emissions unit is exempt from the limits specified in OAC rule 3745-21-09(U) because the emission unit's maximum daily coating usage is less than ten gallons per day.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row f: OAC rule 3745-17-11(B)(1), PE from coating over spray shall not exceed 0.551 lb/hr.

(2) Additional Terms and Conditions

- a. In order to test the spray applicator's effect, coatings being tested in MTL can be applied in the Final Repair Booth (K007). Honda shall include the emissions from this application of MTL test coatings in the Final Repair paint booth as part of the emissions calculated for this emissions unit (MTL).
b. All clean-up and purge materials associated with this emissions unit shall be included under PTI P0105434, as stated below:
i. Air emissions from cleanup/purge material usage from this emission unit shall be recorded, maintained, calculated for recovery emissions credit, reported and considered covered under and included in emissions estimations completed for demonstrating compliance with the emissions limitation specified under Section C.1.b)(2)c. of PTI P0105434.
c. This emissions unit shall use only nonphotochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9) when coating non-metal parts.

c) Operational Restrictions

- (1) For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (gallons per rolling, 12-month period) and OC emissions shall be calculated based upon the actual coating usage and OC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
(2) The permittee shall operate the water curtain whenever spray coating is applied in this emissions unit.
(3) The permittee shall not employ more than ten gallons of coating per day in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line:
a. the company identification of each coating employed;
b. the volume, in gallons, of each coating employed; and
c. the total volume, in gallons, of all of the coatings employed;

- (2) The permittee shall collect and record the following information each month for this emissions unit:
- the company identification of each coating employed and the material(s) to which they were/are employed (metal or non-metal);
 - the OC content and the number of gallons (or part gallon) of each coating applied to non-metal parts;
 - the VOC content and the number of gallons of each coating, thinning solvent applied to metal parts;
 - the calculated total OC emission rate for all coating and thinning solvent, in pound per month;
 - the total rolling 12-month net usage of coating and thinning solvent in gallons; and
 - the total rolling 12-month OC emissions from all coatings and thinning solvent, in tons. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations from the emissions unit to the previous 11 month's emission calculations.
- (3) The permittee shall maintain records that document any time periods when the water curtain was not in service when spray coating was applied in this emissions unit.
- (4) Monthly usage of clean-up and purge materials shall be collected and recorded in accordance with the requirements of clean-up and purge materials in PTI P0105434. Recovery of these materials is included in the record keeping requirements for the recovery tank in PTI P0105434.
- (5) The permit to install for this emissions unit (R016) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: n-Butanol

TLV (mg/m³): 60.6 mg/m³

Maximum Hourly Emission Rate: 5.97 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 360.9 ug/m³

MAGLC : 1444 ug/m³

- (6) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a 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 modeled;
- b. 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
- c. 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (7) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy."
 - a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
 - (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
 - (2) The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15

of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any record showing the application of a photochemically reactive material to non-metal in this emission unit;
 - b. any record showing that the water curtain was not in service when the emissions unit was in operation while applying a spray coating and shall include any corrective actions taken; and
 - c. any record of an exceedance of the 12-month rolling OC emission limitation and/or material usage limitation.

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

- (4) 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 limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

12.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month OC limitation shall be determined through the record keeping specified in Section d)(1) above.

Formulation data from the manufacturer or USEPA Method 24 shall be used to determine the OC content of the coatings, to be used in the calculation of emissions.

b. Emission Limitation:

The total coating usage shall not exceed 10 gallons per day

Applicable Compliance Method:

Compliance with the daily coating usage limitation shall be determined through daily record keeping specified in Section d)(1) above.

c. Emission limitation:

0.551 lb PE/hr from coating overspray

Applicable Compliance Method:

Daily compliance with this limit shall be based on maintaining the requirements for the water curtain control equipment found in Sections c)(2), d)(3), and e)(3)b. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

d. Emission limitation:

0.58 ton PE/yr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the water curtain control equipment specified under Sections c)(2), d)(3), and e)(3)b., and meeting the 4,690 net gallons per rolling 12 months coating usage limit.

e. Emission limitation:

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.