

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install No. 01-06380
Honda of America Manufacturing, Inc.

A. Source Description

Honda of America, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April 1996 Honda submitted a Title V application for the facility. This permit application was also submitted in order to revise old permits and to provide consistency on the plastic's adhesive instrument panel lines. This revision includes the electric drying ovens, which are presently permitted as separate emission units on the Pad #3 and #4 lines, as "curing" ovens. These infrared ovens do not meet the interpretation of the definition of "curing", used by the Ohio EPA. Separate organic compound (OC) limits for the drying ovens (as per PTI#01-4282), which were derived from a calculation of an estimated percent of the total emissions from the adhesive application, in a "booth-oven split", is not practical for these units. Emission units R021 and R022 are presently permitted, along with their electric drying ovens (P031, P032, P033, and P034), for 65.3 tons per year in PTI #01-4282. Emission unit K001 is permitted for 90.4 tons per year, in PTI #01-759; the electric drying ovens are not mentioned in PTI #01-759, and total adhesive and solvent emissions are included with emissions from the booth. Both PTI #01-759 and PTI #01-4282 were issued draft and these existing limits are/were federally enforceable.

B. Facility Emissions and Attainment Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. This permit represents a permitted reduction of 52.8 tons of OC emissions per year, therefore, PSD requirements are not triggered with the submittal of this application.

C. Source Emissions

This permit shall restrict emissions from plastic adhesive applications, on three automobile instrument panel lines, to 102.9 tons of organic compounds per year, and the particulate emissions from adhesive overspray to 6.5 tons per year. The original permitted emissions from the adhesive application were equal to 155.7 tons per year, which equates to a 52.8 ton per year decrease in the permitted, federally enforceable, OC limits from these emission units. Adhesives applied on Pad 1 shall be restricted to 6.0 pounds of OC per gallon and Pad lines #3 and #4, using waterborne adhesives, shall be restricted to 0.40 pounds of OC per gallon. Honda has requested that this permit be issued as a synthetic minor permit with federally enforceable limits on OC emissions, and adhesive and solvent usages.

D. Conclusion

This application represents a total decrease of 52.8 tons of permitted emissions from these emission units. This permit shall place federally enforceable limits on OC emissions from the adhesive applications on three automobile instrument panel lines, as well as, a limit on adhesive and solvent usage. Adhesives applied on Pad 1 shall contain no more than 6.0 pounds of OC per gallon and Pad lines #3 and #4 no more than 0.40 pounds of OC per gallon of adhesive. This permit shall restrict emissions from these emission units to 102.9 tons of organic compounds per year, and particulate emissions from adhesive overspray to 6.5 tons per year. The permit shall allow Honda to apply a credit to emission calculations, for recovered materials, that have been properly tested for their OC content, and for which recordkeeping has been maintained, as per the terms in the permit. The drying ovens have been permitted along with their associated adhesive applications, in order to eliminate the need to demonstrate compliance with an estimated "booth-oven split" in emissions, since this process does not involve the "curing" of the adhesives applied.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
UNION COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center

Application No: 01-06380

DATE: 2/6/2001

Honda of America Manufacturing, Inc.
Cory Sander
24000 Honda Parkway
Marysville, OH 43040-9190

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Terms and Conditions

DRAFT PERMIT TO INSTALL 01-06380

Application Number: 01-06380
APS Premise Number: 0180000130
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Manufacturing, Inc.
Person to Contact: Cory Sander
Address: 24000 Honda Parkway
Marysville, OH 43040-9190

Location of proposed air contaminant source(s) [emissions unit(s)]:
24000 Honda Pkwy
Marysville, Ohio

Description of proposed emissions unit(s):
Adhesive spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Honda of America Manufacturing, Inc.

Facility ID: 0180000130

PTI Application: 01-06380

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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 this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

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10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. 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.

5. Termination of Permit To Install

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This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. Construction Compliance Certification

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The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	102.9
PE	6.5

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Honda
PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Pad #1 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-21-07(G)(9)
	OAC rule 3745-31-05(D)

Honda

PTI A

Emissions Unit ID: K001

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Applicable Emissions
Limitations/Control
Measures

Organic compound emissions shall not exceed 6.0 lbs OC/gal of adhesive.

Particulate emissions from overspray shall not exceed 1.62 tons/yr.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1) and 3745-31-05(D).

Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day when using photochemically reactive material.

Exempt from the limitations in 3745- 21-07(G)(2) when using only non-photochemically reactive materials or material exempt under 3745-21- 07(G)(9).

Organic compound emissions shall not exceed 90.3 tons per rolling 12 months, from the Pad #1 instrument panel adhesive operations.

Adhesive usage shall not exceed 26,330 gallons per rolling 12 months; and

purge, cleaning material, and miscellaneous solvent usage shall not exceed 2,223 net gallons (total usage-amount recycled) per rolling 12 months.

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

Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.

Hond**PTI A**

Emissions Unit ID: K001

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month adhesive and cleaning solvent/purge usage (gallons per rolling twelve-months) and OC emissions shall be calculated based upon the actual material usage and OC emissions from this emissions unit, initially including the twelve month period prior to issuance of this permit and rolling with each passing month.
- 2.b** Net gallons used and OC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. A composite sample of each shipment of recovered materials, including any combination of adhesive, cleanup, and purge, shall be collected and tested (on or off-site), using USEPA Method 24, to determine the OC content. The OC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents. If adhesives, purge, and/or cleanup materials from the Pad #1 instrument panel adhesive operations are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered material(s) is used to show compliance with the 90.3 tons of OC per year, Pad #1 instrument panel adhesive application limit, the credit for the recovered material shall be calculated proportionately, according to this emissions unit's OC contribution to the shipment, and records of the recovered material shall be maintained as required in Section A.III.3. No OC credit, to the Pad #1 instrument panel adhesive emissions, shall be calculated using a gallon usage or weight of recovered material greater than that which was added

Honda**PTI A****Issued: To be entered upon final issuance**

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to the recovery container(s) from K001 operations during any month, nor an OC concentration greater than the recovered material's OC testing result(s) and MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used" in the Pad #1 instrument panel adhesive operations (materials collected from other emission units) shall also not be included in the credit to these emissions and material use (gallons). A record shall be maintained of the date the recovery tanks are emptied and recovered materials shipped off-site. The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the month the material is shipped off-site, in the month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank(s).

II. Operational Restrictions

The permittee shall operate the water wall control system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of the company identification for each adhesive, purge, and cleanup material employed, their chemical composition, and documentation to show each to be either photochemically reactive or nonphotochemically reactive.
2. The permittee shall collect and record the following information for each day when using a photochemically reactive material:
 - a. the company identification for each adhesive and photochemically reactive purge and cleanup material employed;

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Emissions Unit ID: K001

- b. the number of gallons of each adhesive and photochemically reactive purge and cleanup materials employed;
 - c. the organic compound content of each adhesive and photochemically reactive purge and cleanup materials, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
3. The permittee shall collect and record the following information each month for the adhesive operation:
 - a. the name and identification of each adhesive applied; and
 - b. the OC content of each adhesive applied; or
 - c. documentation showing the monthly recordkeeping of the OC per gallon is not required if each and every adhesive applied in this emission unit is at or below 6.0 pounds of OC per gallon; this documentation, for each adhesive applied, must be maintained on file and provided upon request.
4. The permittee shall collect and record the following information, at the end of each month for the adhesive operation, for the purpose of determining the rolling 12-month material usage and emissions:
 - a. the company identification for each adhesive, purge, and cleanup material employed;
 - b. the number of gallons of each adhesive, purge, and cleanup material employed;
 - c. the organic compound content of each adhesive, purge, and cleanup material, in pounds per gallon;
 - d. the calculated total organic compound emission rate for all adhesive, purge, and cleanup materials, prior to the credit for recovered materials, in pound per month;
 - e. if a credit for recovered materials is to be used, the total amount of adhesive and purge/cleanup material collected and shipped for recycle/recovery and/or disposal at an outside

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- facility (gal), and the mass (lbs) of OC from adhesives and the mass (lbs) of OC from cleanup/purge materials to be credited to the calculations of K001 emissions (lbs), to demonstrate compliance with the limit in Section A.I.1, tested and calculated as per Section A.I.2.b;
- f. the total net usage, in gallons per month, of all adhesive materials used, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of adhesive collected {e});
 - g. the total net usage, in gallons per month, of all purge and cleaning materials used, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of purge and cleanup collected {e});
 - h. the number of instrument panels produced on the Pad #1 line (number/month), and the calculated emissions (as per Testing Section A.V.1);
 - i. the total net OC emissions from all adhesive, purge and cleanup material employed, in pounds or tons per month, i.e. (d)-(lbs of recovered OCs {e}) + (emissions from h); and
 - j. the calculated rolling 12-month summation of organic compound emissions from the adhesives, purge and cleaning materials, and pad sheets applied in this emissions unit.
5. The permittee shall maintain records that document any time periods when the water wall control system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
- 2. The permittee shall submit deviation (excursion) reports which include any exceedance of the permit limits:

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- a. an identification of any monthly record showing OC emissions from the application of plastic adhesives, purge and cleaning solvents, and from OC losses from the pad sheets in the drying ovens to exceed 90.3 tons OC per rolling 12 months, in the Pad #1 adhesive application;
- b. an identification of any rolling 12-month record showing the total use of plastic adhesives to exceed 26,330 gallons; and
- c. an identification of any rolling 12-month record showing the total net use of purge and cleaning solvents to exceed 2,223 gallons.

These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

3. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
4. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the water wall control system was not in service when the emissions unit was in operation using a spray coating application. 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.
5. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the use of noncomplying adhesives, exceeding 6.0 lbs OC/gal. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

Issued: To be entered upon final issuance1. Emission Limitation

90.3 tons OC emissions per rolling 12-months from K001 adhesives, purge and cleaning materials, and pad sheets

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and rolling 12-month recordkeeping of the adhesives, purge, and cleaning material usage; the organic compound content of each material used; if a recovery credit is to be used, the amount of adhesive and the amount of cleanup/purge material collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the rolling 12-month summation of calculated OC emissions. Any recycle/recovery credit shall be calculated and applied and as per Section A.I.2.b. Formulation data from the adhesives, purge, and cleaning materials' manufacturers or US EPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. To ensure enforceability during the first 12 calendar months of operation, the rolling 12-month adhesive, purge, and cleaning material usage (gallons/rolling twelve months) and number of pad sheets shall be calculated based upon the actual material usage, initially including the twelve month period prior to issuance of this permit and rolling with each passing month. Compliance with the 12-month rolling organic compound emissions from the adhesive operations shall be calculated monthly, as the summation of the emissions of all materials applied, plus the pad sheet emissions, minus any credit for recovered composite material, (the pounds of credit calculated as per Section A.I.2.b).

Each month's emissions shall be calculated as follows, and shall be added to the previous 11 month's emission calculations:

$$[(\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/month}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/month}) + (\text{lbs OC/gal of cleaning material}) \times (\text{cleaning material usage in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered adhesive in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered cleanup and purge in gal/month})], \text{ plus emissions from pad sheets calculated as:}$$

$$\text{pad sheet emissions} = \# \text{ instrument panels/month} \times \text{grams OC/sheet} \times 1 \text{ sheet/\# of instrument panels} \times 0.002205 \text{ lb/gm}$$

2. Emission Limitation

8 pounds OC per hour and 40 pounds OC per day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials (PRM), shall be determined through daily recordkeeping of the adhesives, and photochemically reactive purge and cleanup material usage, the organic compound content of each material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each of these materials applied. Formulation data from the manufacturers or US EPA Method 24 shall be used to determine the organic compound content and PRM content of the plastic adhesives, purge, and cleanup materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of all adhesives and PRM cleanup/purge applied, when using PRM materials (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed for all adhesives and PRM cleanup/purge applied, when using PRM materials. Hourly emissions may be calculated by multiplying the OC content of the adhesives and PRM purge and cleanup materials used (lbs OC/gallon of material) times each material's maximum usage in any hour (gallons/hr); or if the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented for each material subject to the rule and summed for total emissions:

OC emissions/hr = (lbs OC/gal of adhesive) x (maximum adhesive usage in gal/hr) + (lbs OC/gal of purge material) x (maximum purge material usage in gal/hr) + (lbs OC/gal of cleanup material) x (maximum cleanup material usage in gal/hr) or:

OC emissions/hr = [(lbs OC/gal of adhesive) x (adhesive usage in gal/day) + (lbs OC/gal of purge) x (purge usage in gal/day) + (lbs OC/gal of cleanup material) x (cleanup material usage in gal/day)] x [(1 day /hours of operation)]; and

OC emissions/day = (lbs OC/gal of adhesive) x (adhesive usage in gal/day) + (lbs OC/gal of purge material) x (purge material usage in gal/day) + (lbs OC/gal of cleanup material) x (cleanup material usage in gal/day)

3. Emission Limitation

6.0 lbs OC/gallon of adhesive

Applicable Compliance Method

Compliance with this limit shall be determined through monthly recordkeeping of the organic compound content of each adhesive applied in K001, or documentation that each adhesive used in K001 is equal to or less than 6.0 lbs OC/gal. Formulation data from the adhesive manufacturers' or USEPA Method 24 shall be used to determine the organic compound content of the materials.

4.a Emission Limitation

0.551 pound particulate emissions/hr from coating overspray

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PTI A

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**Honda
PTI A**

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the water wall control system found in Sections A.II.1, A.III.5, and A.IV.4 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

4.b Emission Limitation

1.62 tons particulate emissions/yr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the water wall control system specified under Sections A.II.1, A.III.5, and A.IV.4 of Part III, and demonstration of compliance with the rolling 12-month limit on adhesive usage.

5. Emission Limitation

Visible particulate emissions shall not exceed 20% 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).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pad #1 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	Ohio Air Toxic Policy	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K001) 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" pollutants:

Pollutant: dichloromethane / methylene chloride
 TLV: 173.7 mg/m³
 Maximum Hourly Emission Rate: 2.13 lbs/hr
 Predicted 1-Hour Maximum Ground-Level Concentration: 694.5 ug/m³
 MAGLC : 4,135 ug/m³

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Pollutant: methyl ethyl ketone

TLV: 589.8 mg/m³

Maximum Hourly Emission Rate: 13.76 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,487 ug/m³

MAGLC : 14,042 ug/m³

Pollutant: Toluene

TLV: 188 mg/m³

Maximum Hourly Emission Rate: 5.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 1,911 ug/m³

MAGLC : 4,476 ug/m³

2. 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.

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3. 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. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

The requirements in this Permit to Install (#01-06380) supercedes and replaces the requirements for this emissions unit in PTI #01-759.

**Honda
PTI A**

Emissions Unit ID: R021

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Pad #3 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-21-07(G)(9)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-31-05(D)

Honda

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Applicable Emissions Limitations/Control Measures	
Organic compound emissions shall not exceed 0.40 lbs OC/gal of adhesive.	Adhesive usage shall not exceed 24,214 net gallons (total usage-amount recycled) per rolling 12 months, from the Pads #3 and #4 instrument panel adhesive operations together, R021 and R022; and
Particulate emissions from overspray shall not exceed 4.83 tons/yr from R021 and R022 together.	purge, cleaning material, and miscellaneous solvent usage shall not exceed 440 net gallons (total usage-amount recycled) per rolling 12 months, from the Pads #3 and #4 instrument panel adhesive operations together, R021 and R022.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1) 3745-31-05(D).	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day when using photochemically reactive material.	Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.
Exempt from the limitations in 3745- 21-07(G)(2) when using only non-photochemically reactive materials or material exempt under 3745-21- 07(G)(9).	
Organic compound emissions shall not exceed 12.6 tons per rolling 12 months, from the Pads #3 and #4 instrument panel adhesive operations together, R021 and R022.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month adhesive and cleaning solvent/purge usage (gallons per rolling twelve-months) and OC emissions shall be calculated based upon the actual material usage and OC emissions from this emissions unit, initially including the twelve month period prior to issuance of this permit and rolling with each passing month.
- 2.b** Net gallons used and OC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. A composite sample of each shipment of recovered materials, including any combination of adhesive, cleanup, and purge, shall be collected and tested (on or off-site), using USEPA Method 24, to determine the OC content. The OC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents. If adhesive, purge, and/or cleanup materials from the Pads #3 and #4 adhesive operations are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered material(s) is used to show compliance with the 12.6 tons of OC per year, Pads #3 and #4 adhesive application limit, the credit for the recovered material shall be calculated proportionately, according to R021 and R022 emission units' OC contribution to the shipment, and records of the recovered material shall be maintained as required in Section A.III.3. No OC credit, to the Pads #3 and #4 adhesive emissions, shall be calculated using a gallon usage or weight of recovered material greater than that which was added to the recovery container(s) from R021 and R022 operations during any month, nor an OC concentration greater than the recovered material's OC testing result(s) and MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used" in the Pads #3 and #4 adhesive operations (materials collected from other emission units) shall also not be included in the credit to these emissions and material use (gallons). A record shall be maintained of the date the recovery tanks are emptied and recovered materials shipped off-site. The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the month the material is shipped off-site, in the month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank(s).

II. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall maintain a record of the company identification for each adhesive, purge, and cleanup material employed, their chemical composition, and documentation to show each to be either photochemically reactive or nonphotochemically reactive.
2. The permittee shall collect and record the following information for each day when using a photochemically reactive material:
 - a. the company identification for each adhesive and photochemically reactive purge and cleanup material employed;
 - b. the number of gallons of each adhesive and photochemically reactive purge and cleanup materials employed;
 - c. the organic compound content of each adhesive and photochemically reactive purge and cleanup materials, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
3. The permittee shall collect and record the following information each month for the adhesive operation:
 - a. the name and identification of each adhesive applied; and
 - b. the OC content of each adhesive applied; or
 - c. documentation showing the monthly recordkeeping of the OC per gallon is not required if each and every adhesive applied in this emission unit is at or below 0.40 pounds of OC per gallon; this documentation, for each adhesive applied, must be maintained on file and provided upon request.
4. The permittee shall collect and record the following information each month for the Pad lines # 3 and #4 instrument panel adhesive operations, for the purpose of determining the rolling 12-month material usage and emissions:
 - a. the company identification for each adhesive, purge, and cleanup material employed;

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- b. the number of gallons of each adhesive, purge, and cleanup material employed;
 - c. the organic compound content of each adhesive, purge, and cleanup material, in pounds per gallon;
 - d. the calculated total organic compound emission rate for all adhesive, purge, and cleanup materials, prior to the credit for recovered materials, in pound per month;
 - e. if a credit for recovered materials is to be used, the total amount of adhesive and purge/cleanup material collected and shipped for recycle/recovery and/or disposal at an outside facility (gal), and the mass (lbs) of OC from adhesives and the mass (lbs) of OC from cleanup/purge materials to be credited to the calculations of R021 and R021 emissions (lbs), to demonstrate compliance with the limit in Section A.I.1, tested and calculated as per Section A.I.2.b;
 - f. the total net usage, in gallons per month, of all adhesive materials used on R021 and R022 together, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of adhesive collected {e});
 - g. the total net usage, in gallons per month, of all purge and cleaning materials used on R021 and R022 together, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of purge and cleanup collected {e});
 - h. the number of instrument panels produced on the Pad lines #3 and #4 (number/month), and the calculated emissions (as per Testing Section A.V.1);
 - i. the total net OC emissions from all adhesive, purge and cleanup material employed in R021 and R022 together, in pounds or tons per month, i.e. (d)-(lbs of recovered OCs {e}) + (emissions from h); and
 - j. the calculated rolling 12-month summation of organic compound emissions from the adhesives, purge and cleaning materials, and pad sheets applied in these emissions units (R021 & R022).
5. The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

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- a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which include any exceedance of the permit limits:
- a. an identification of any monthly record showing OC emissions from the application of plastic adhesives, purge and cleaning solvents, and from OC losses from the pad sheets in the drying ovens to exceed 12.6 tons OC per rolling 12 months, from the Pads #3 and #4 adhesive applications;
 - b. an identification of any rolling 12-month record showing the total use of plastic adhesives to exceed 24,214 gallons, from the Pads #3 and #4 adhesive applications; and
 - c. an identification of any rolling 12-month record showing the total net use of purge and cleaning solvents to exceed 440 gallons, from the Pads #3 and #4 adhesive applications.

These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

3. The permittee shall also submit annual reports which specify the total organic compound emissions from emission units R021 and R022 for the previous calendar year. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
4. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the dry filtration system was not in service when the emissions unit was in operation using a spray coating application. 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.
5. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the use of noncomplying adhesives, exceeding 0.40 lbs OC/gal. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

Honda

PTI A

Emissions Unit ID: R021

Issued: To be entered upon final issuance1. Emission Limitation

12.6 tons OC emissions per rolling 12-months from adhesives, purge and cleaning materials, and pad sheets, from the Pads #3 and #4 adhesive applications

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and rolling 12-month recordkeeping of the adhesives, purge, and cleaning material usage; the organic compound content of each material used; if a recovery credit is to be used, the amount of adhesive and the amount of cleanup/purge material collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the rolling 12-month summation of calculated OC emissions. Any recycle/recovery credit shall be calculated and applied as per Section A.I.2.b. Formulation data from the adhesives, purge, and cleaning materials' manufacturers or US EPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. To ensure enforceability during the first 12 calendar months of operation, the rolling 12-month adhesive, purge, and cleaning material usage (gallons/rolling twelve months) and number of pad sheets shall be calculated based upon the actual material usage, initially including the twelve month period prior to issuance of this permit and rolling with each passing month. Compliance with the 12-month rolling organic compound emissions from the adhesive operations shall be calculated monthly, as the summation of the emissions of all materials applied in R021 and R022 together, plus the pad sheet emissions, minus any credit for recovered composite material, (the pounds of credit calculated as per Section A.I.2.b).

Each month's emissions shall be calculated as follows, and shall be added to the previous 11 month's emission calculations:

$$[(\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/month}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/month}) + (\text{lbs OC/gal of cleaning material}) \times (\text{cleaning material usage in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered adhesive in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered cleanup and purge in gal/month})], \text{ plus emissions from pad sheets calculated as:}$$

$$\text{pad sheet emissions} = \# \text{ instrument panels/month} \times \text{grams OC/sheet} \times 1 \text{ sheet/\# of instrument panels} \times 0.002205 \text{ lb/gm}$$

2. Emission Limitation

8 pounds OC per hour and 40 pounds OC per day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials (PRM), shall be determined through daily recordkeeping of the adhesives, and photochemically reactive purge and cleanup material usage, the organic compound content of each material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each of these materials applied. Formulation data from the manufacturers or US EPA Method 24 shall be used to determine the organic compound content and PRM content of the plastic adhesives, purge, and cleanup materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of all adhesives and PRM cleanup/purge applied, when using PRM materials (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed for all adhesives and PRM cleanup/purge applied, when using PRM materials. Hourly emissions may be calculated by multiplying the OC content of the adhesives and PRM purge and cleanup materials used (lbs OC/gallon of material) times each material's maximum usage in any hour (gallons/hr); or if the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented for each material subject to the rule and summed for total emissions:

$$\text{OC emissions/hr} = (\text{lbs OC/gal of adhesive}) \times (\text{maximum adhesive usage in gal/hr}) + (\text{lbs OC/gal of purge material}) \times (\text{maximum purge material usage in gal/hr}) + (\text{lbs OC/gal of cleanup material}) \times (\text{maximum cleanup material usage in gal/hr}) \text{ or:}$$

$$\text{OC emissions/hr} = [(\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/day}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/day}) + (\text{lbs OC/gal of cleanup material}) \times (\text{cleanup material usage in gal/day})] \times [(1 \text{ day} / \text{hours of operation})]; \text{ and}$$

$$\text{OC emissions/day} = (\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/day}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/day}) + (\text{lbs OC/gal of cleanup material}) \times (\text{cleanup material usage in gal/day})$$
3. Emission Limitation

0.40 lbs OC/gallon of adhesive

Applicable Compliance Method

Compliance with this limit shall be determined through monthly recordkeeping of the organic compound content of each adhesive applied in R021, or documentation that each adhesive used in R021 is equal to or less than 0.40 lbs OC/gal. Formulation data from the adhesive manufacturers'

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or USEPA Method 24 shall be used to determine the organic compound content of the materials.

4.a Emission Limitation

0.551 pound particulate emissions/hr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system found in Sections A.II.1, A.III.5, and A.IV.4 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

4.b Emission Limitation

4.83 tons particulate emissions/yr from coating overspray from R021 and R022 together

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system specified under Sections A.II.1, A.III.5, and A.IV.4 of Part III, and demonstration of compliance with the rolling 12-month limit on adhesive usage.

5. Emission Limitation

Visible particulate emissions shall not exceed 20% 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).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pad #3 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	Ohio Air Toxic Policy	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit (R021) 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 only two pollutants with potential emissions over 1 ton, from R021 and R022 together:

Pollutant: dichloromethane / methylene chloride

TLV: 173.7 mg/m³

Maximum Hourly Emission Rate: 0.63 lb/hr from R021 & R022

Predicted 1-Hour Maximum Ground-Level Concentration: 246.8 ug/m³ from R021 & R022

MAGLC : 4,135 ug/m³

Issued: To be entered upon final issuance

Pollutant: triethylamine

TLV: 4.1 mg/m³

Maximum Hourly Emission Rate: 0.59 lb/hr from R021 & R022

Predicted 1-Hour Maximum Ground-Level Concentration: 49 ug/m³ from R021 & R022

MAGLC : 97.6 ug/m³

2. 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.
3. 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. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Honda of America Manufacturing, Inc.

PTI Application: 01-06380

Issued

Facility ID: 0180000130

Emissions Unit ID: R021

- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

The requirements in this Permit to Install (#01-06380) supercedes and replaces the requirements for this emissions unit in PTI #01-4282.

**Honda
PTI A**

Emissions Unit ID: R022

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Pad #4 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-21-07(G)(9)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-31-05(D)

Honda

PTI A

Emissions Unit ID: R022

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Organic compound emissions shall not exceed 0.40 lbs OC/gal of adhesive.

Particulate emissions from overspray shall not exceed 4.83 tons/yr from R021 and R022 together.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).

Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day when using photochemically reactive material.

Exempt from the limitations in 3745- 21-07(G)(2) when using only non-photochemically reactive materials or material exempt under 3745-21- 07(G)(9).

Organic compound emissions shall not exceed 12.6 tons per rolling 12 months, from the Pads #3 and #4 instrument panel adhesive operations

together, R021 and R022.

Adhesive usage shall not exceed 24,214 net gallons (total usage-amount recycled) per rolling 12 months, from the Pads # 3 and #4 instrument panel adhesive operations together, R021 and R022; and

purge, cleaning material, and miscellaneous solvent usage shall not exceed 440 net gallons (total usage-amount recycled) per rolling 12 months, from the Pads #3 and #4 instrument panel adhesive operations together, R021 and R022.

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

Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month adhesive and cleaning solvent/purge usage (gallons per rolling twelve-months) and OC emissions shall be calculated based upon the actual material usage and OC emissions from this emissions unit, initially including the twelve month period prior to issuance of this permit and rolling with each passing month.
- 2.b** Net gallons used and OC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. A composite sample of each shipment of recovered materials, including any combination of adhesive, cleanup, and purge, shall be collected and tested (on or off-site), using USEPA Method 24, to determine the OC content. The OC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents. If adhesive, purge, and/or cleanup materials from the Pads #3 and #4 adhesive operations are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered material(s) is used to show compliance with the 12.6 tons of OC per year, Pads #3 and #4 adhesive application limit, the credit for the recovered material shall be calculated proportionately, according to R021 and R022 emission units' OC contribution to the shipment, and records of the recovered material shall be maintained as required in Section A.III.3. No OC credit, to Pads #3 and #4 adhesive emissions, shall be calculated using a gallon usage or weight of recovered material greater than that which was added to the recovery container(s) from R021 and R022 operations during any month, nor an OC concentration greater than the recovered material's OC testing result(s) and MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used" in the Pads #3 and #4 adhesive operations (materials collected from other emission units) shall also not be included in the credit to these emissions and material use (gallons). A record shall be maintained of the date the recovery tanks are emptied and recovered materials shipped off-site. The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the month the material is shipped off-site, in the month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank(s).

II. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

Honda of America Manufacturing, Inc.

PTI Application: 01-06280

Issued

Facility ID: 0180000130

Emissions Unit ID: R022

1. The permittee shall maintain a record of the company identification for each adhesive, purge, and cleanup material employed, their chemical composition, and documentation to show each to be either photochemically reactive or nonphotochemically reactive.
2. The permittee shall collect and record the following information for each day when using a photochemically reactive material:
 - a. the company identification for each adhesive and photochemically reactive purge and cleanup material employed;
 - b. the number of gallons of each adhesive and photochemically reactive purge and cleanup materials employed;
 - c. the organic compound content of each adhesive and photochemically reactive purge and cleanup materials, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all adhesive and photochemically reactive purge and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
3. The permittee shall collect and record the following information each month for the adhesive operation:
 - a. the name and identification of each adhesive applied; and
 - b. the OC content of each adhesive applied; or
 - c. documentation showing the monthly recordkeeping of the OC per gallon is not required if each and every adhesive applied in this emission unit is at or below 0.40 pounds of OC per gallon; this documentation, for each adhesive applied, must be maintained on file and provided upon request.
4. The permittee shall collect and record the following information each month for the Pads #3 and #4 instrument panel adhesive operations, for the purpose of determining the rolling 12-month material usage and emissions:
 - a. the company identification for each adhesive, purge, and cleanup material employed;

Issued: To be entered upon final issuance

- b. the number of gallons of each adhesive, purge, and cleanup material employed;
 - c. the organic compound content of each adhesive, purge, and cleanup material, in pounds per gallon;
 - d. the calculated total organic compound emission rate for all adhesive, purge, and cleanup materials, prior to the credit for recovered materials, in pound per month;
 - e. if a credit for recovered materials is to be used, the total amount of adhesive and purge/cleanup material collected and shipped for recycle/recovery and/or disposal at an outside facility (gal), and the mass (lbs) of OC from adhesives and the mass (lbs) of OC from cleanup/purge materials to be credited to the calculations of R021 and R022 emissions (lbs), to demonstrate compliance with the limit in Section A.I.1, tested and calculated as per Section A.I.2.b;
 - f. the total net usage, in gallons per month, of all adhesive materials used on R021 and R022 together, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of adhesive collected {e});
 - g. the total net usage, in gallons per month, of all purge and cleaning materials used on R021 and R022 together, and the rolling 12-month net usage, in gallons, i.e. (b)-(gallons of purge and cleanup collected {e});
 - h. the number of instrument panels produced on the Pad lines #3 and #4 (number/month), and the calculated emissions (as per Testing Section A.V.1);
 - i. the total net OC emissions from all adhesive, purge and cleanup material employed in R021 and R022 together, in pounds or tons per month, i.e. (d)-(lbs of recovered OCs {e}) + (emissions from h); and
 - j. the calculated rolling 12-month summation of organic compound emissions from the adhesives, purge and cleaning materials, and pad sheets applied in these emissions units (R021 & R022).
5. The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

Honda of America Manufacturing, Inc.

PTI Application: 01-06380

Issued

Facility ID: 0180000130

Emissions Unit ID: R022

- a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the adhesive materials and photochemically reactive purge/cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which include any exceedance of the permit limits:
- a. an identification of any monthly record showing OC emissions from the application of plastic adhesives, purge and cleaning solvents, and from OC losses from the pad sheets in the drying ovens to exceed 12.6 tons OC per rolling 12 months, from the Pads #3 and #4 adhesive applications;
 - b. an identification of any rolling 12-month record showing the total use of plastic adhesives to exceed 24,214 gallons, from the Pads #3 and #4 adhesive applications; and
 - c. an identification of any rolling 12-month record showing the total net use of purge and cleaning solvents to exceed 440 gallons, from Pads #3 and #4 adhesive applications.

These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

3. The permittee shall also submit annual reports which specify the total organic compound emissions from emission units R021 and R022 for the previous calendar year. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
4. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the dry filtration system was not in service when the emissions unit was in operation using a spray coating application. 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.
5. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the use of noncomplying adhesives, exceeding 0.40 lbs OC/gal. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.

V. Testing Requirements

Compliance with the organic compound emission limitations contained in this permit shall be determined in accordance with the following methods:

Honda**PTI A**

Emissions Unit ID: R022

Issued: To be entered upon final issuance1. Emission Limitation

12.6 tons OC emissions per rolling 12-months from adhesives, purge and cleaning materials, and pad sheets, from the Pads #3 and #4 adhesive applications

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and rolling 12-month recordkeeping of the adhesives, purge, and cleaning material usage; the organic compound content of each material used; if a recovery credit is to be used, the amount of adhesive and the amount of cleanup/purge material collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the rolling 12-month summation of calculated OC emissions. Any recycle/recovery credit shall be calculated and applied as per Section A.I.2.b. Formulation data from the adhesives, purge, and cleaning materials' manufacturers or US EPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. To ensure enforceability during the first 12 calendar months of operation, the rolling 12-month adhesive, purge, and cleaning material usage (gallons/rolling twelve months) and number of pad sheets shall be calculated based upon the actual material usage, initially including the twelve month period prior to issuance of this permit and rolling with each passing month. Compliance with the 12-month rolling organic compound emissions from the adhesive operations shall be calculated monthly, as the summation of the emissions of all materials applied in R021 and R022 together, plus the pad sheet emissions, minus any credit for recovered composite material, (the pounds of credit calculated as per Section A.I.2.b).

Each month's emissions shall be calculated as follows, and shall be added to the previous 11 month's emission calculations:

$$[(\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/month}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/month}) + (\text{lbs OC/gal of cleaning material}) \times (\text{cleaning material usage in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered adhesive in gal/month})] - [(\text{lbs OC/gal of recovered composite material}) \times (\text{recovered cleanup and purge in gal/month})], \text{ plus emissions from pad sheets calculated as:}$$

$$\text{pad sheet emissions} = \# \text{ instrument panels/month} \times \text{grams OC/sheet} \times 1 \text{ sheet/\# of instrument panels} \times 0.002205 \text{ lb/gm}$$

2. Emission Limitation

8 pounds OC per hour and 40 pounds OC per day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials (PRM), shall be determined through daily recordkeeping of the adhesives, and photochemically reactive purge and cleanup material usage, the organic compound content of each material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each of these materials applied. Formulation data from the manufacturers or US EPA Method 24 shall be used to determine the organic compound content and PRM content of the plastic adhesives, purge, and cleanup materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of all adhesives and PRM cleanup/purge applied, when using PRM materials (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed for all adhesives and PRM cleanup/purge applied, when using PRM materials. Hourly emissions may be calculated by multiplying the OC content of the adhesives and PRM purge and cleanup materials used (lbs OC/gallon of material) times each material's maximum usage in any hour (gallons/hr); or if the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented for each material subject to the rule and summed for total emissions:

$$\text{OC emissions/hr} = (\text{lbs OC/gal of adhesive}) \times (\text{maximum adhesive usage in gal/hr}) + (\text{lbs OC/gal of purge material}) \times (\text{maximum purge material usage in gal/hr}) + (\text{lbs OC/gal of cleanup material}) \times (\text{maximum cleanup material usage in gal/hr}) \text{ or:}$$

$$\text{OC emissions/hr} = [(\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/day}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/day}) + (\text{lbs OC/gal of cleanup material}) \times (\text{cleanup material usage in gal/day})] \times [(1 \text{ day} / \text{hours of operation})]; \text{ and}$$

$$\text{OC emissions/day} = (\text{lbs OC/gal of adhesive}) \times (\text{adhesive usage in gal/day}) + (\text{lbs OC/gal of purge material}) \times (\text{purge material usage in gal/day}) + (\text{lbs OC/gal of cleanup material}) \times (\text{cleanup material usage in gal/day})$$
3. Emission Limitation

0.40 lbs OC/gallon of adhesive

Applicable Compliance Method

Compliance with this limit shall be determined through monthly recordkeeping of the organic compound content of each adhesive applied in R022, or documentation that each adhesive used in R022 is equal to or less than 0.40 lbs OC/gal. Formulation data from the adhesive manufacturers'

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or USEPA Method 24 shall be used to determine the organic compound content of the materials.

4.a Emission Limitation

0.551 pound particulate emissions/hr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system found in Sections A.II.1, A.III.5, and A.IV.4 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

4.b Emission Limitation

4.83 tons particulate emissions/yr from coating overspray from R021 and R022 together

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system specified under Sections A.II.1, A.III.5, and A.IV.4 of Part III, and demonstration of compliance with the rolling 12-month limit on adhesive usage.

5. Emission Limitation

Visible particulate emissions shall not exceed 20% 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).

VI. Miscellaneous Requirements

None

Honda of America Manufacturing, Inc.

PTI Application: 01-06280

Issued

Facility ID: 0180000130

Emissions Unit ID: R022

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pad #4 instrument panel adhesive and laminated sheet application, with electric flash/foundation and cure ovens (Modification)	Ohio Air Toxic Policy	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (R022) 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 only two pollutants with potential emissions over 1 ton, from R021 and R022 together:

Pollutant: dichloromethane / methylene chloride

TLV: 173.7 mg/m³

Maximum Hourly Emission Rate: 0.63 lb/hr from R021 & R022

Predicted 1-Hour Maximum Ground-Level Concentration: 246.8 ug/m³ from R021 & R022MAGLC : 4,135 ug/m³

Issued: To be entered upon final issuance

Pollutant: triethylamine

TLV: 4.1 mg/m³

Maximum Hourly Emission Rate: 0.59 lb/hr from R021 & R022

Predicted 1-Hour Maximum Ground-Level Concentration: 49 ug/m³ from R021 & R022

MAGLC : 97.6 ug/m³

2. 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.
3. 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. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Honda of America Manufacturing, Inc.

PTI Application: 01-06380

Issued

Facility ID: 0180000130

Emissions Unit ID: R022

- 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

The requirements in this Permit to Install (#01-06380) supercedes and replaces the requirements for this emissions unit in PTI #01-4282.

NEW SOURCE REVIEW FORM B

PTI Number: 01-06380 Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION Manufacturer of Automobiles CITY/TWP Marysville

SIC CODE 3711 SCC CODE 4-02-022-01 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Pad #1 instrument panel adhesive application, with flash/foundation and cure ovens

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.551	1.62	0.551	1.62
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	24.9	90.3	24.9 & 8 w/PRM	90.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: dichloromethane, methyl ethyl keytone, toluene, tetrahydrofuran, and ethyl acetate

NEW SOURCE REVIEW FORM B

PTI Number: 01-06380 Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION Manufacturer of Automobiles CITY/TWP Marvsville

Emissions Unit ID: R022

SIC CODE 3711 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R021

EMISSIONS UNIT DESCRIPTION Pad #3 instrument panel adhesive application, with flash/foundation and cure ovens

DATE INSTALLED 6/1993

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.551	2.41	0.551	2.41
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	1.94	6.3	1.94	6.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: dichloromethane and triethylamine

54 NEW SOURCE REVIEW FORM B

PTI Number: 01-06380 Facility ID: 0180000130
 FACILITY NAME Honda of America Manufacturing, Inc.
 FACILITY DESCRIPTION Manufacturer of Automobiles CITY/TWP Marvsville

Emissions Unit ID: R022

SIC CODE 3711 SCC CODE 4-02-022-01 EMISSIONS UNIT ID R022
 EMISSIONS UNIT DESCRIPTION Pad #4 instrument panel adhesive application, with flash/foundation and cure ovens
 DATE INSTALLED 6/1993

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.551	2.41	0.551	2.41
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	1.94	6.3	1.94	6.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: dichloromethane and triethylamine

5 NEW SOURCE REVIEW FORM B

PTI Number: 01-06380

Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION Manufacturer of Automobiles

CITY/TWP Marvsville

Emissions Unit ID: R022

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

PSD- NA this permit represents a decrease in permitted emissions

NSPS- NA, adhesive application to plastic dashboards

Applicable rules:

3745-21-07 for plastics

3745-17-07 for PM overspray

3745-17-11, Table I for PM overspray

3745-31-05(D) synthetic minor

3745-31-05(A)(3) BAT

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Honda of America, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April 1996 Honda submitted a Title V application for the facility. This permit application was also submitted in order to revise old permits and to provide consistency on the plastic's adhesive instrument panel lines. This revision includes the electric drying ovens, which are presently permitted as separate emission units on the Pad #3 and #4 lines, as "curing" ovens. These infrared ovens do not meet the interpretation of the definition of "curing", used by the Ohio EPA. Separate organic compound (OC) limits for the drying ovens (as per PTI#01-4282), which were derived from a calculation of an estimated percent of the total emissions from the adhesive application, in a "booth-oven split", is not practical for these units. Emission units R021 and R022 are

presently permitted, along with their electric drying ovens (P031, P032, P033, and P034), for 65.3 tons per year in PTI #01-4282. Emission unit K001 is permitted for 90.4 tons per year, in PTI #01-759; the electric drying ovens are not mentioned in PTI #01-759, and total adhesive and solvent emissions are included with emissions from the booth. Both PTI #01-759 and PTI #01-4282 were issued draft and these existing limits are/were federally enforceable.

B. Facility Emissions and Attainment Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. This permit represents a permitted reduction of 52.8 tons of OC emissions per year, therefore, PSD requirements are not triggered with the submittal of this application.

C. Source Emissions

This permit shall restrict emissions from plastic adhesive applications, on three automobile instrument panel lines, to 102.9 tons of organic compounds per year, and the particulate emissions from adhesive overspray to 6.5 tons per year. The original permitted emissions from the adhesive application were equal to 155.7 tons per year, which equates to a 52.8 ton per year decrease in the permitted, federally enforceable, OC limits from these emission units. Adhesives applied on Pad 1 shall be restricted to 6.0 pounds of OC per gallon and Pad lines #3 and #4, using waterborne adhesives, shall be restricted to 0.40 pounds of OC per gallon. Honda has requested that this permit be issued as a synthetic minor permit with federally enforceable limits on OC emissions, and adhesive and solvent usages.

D. Conclusion

This application represents a total decrease of 52.8 tons of permitted emissions from these emission units. This permit shall place federally enforceable limits on OC emissions from the adhesive applications on three automobile instrument panel lines, as well as, a limit on adhesive and solvent usage. Adhesives applied on Pad 1 shall contain no more than 6.0 pounds of OC per gallon and Pad lines #3 and #4 no more than 0.40 pounds of OC per gallon of adhesive. This permit shall restrict emissions from these emission units to 102.9 tons of organic compounds per year, and particulate emissions from adhesive overspray to 6.5 tons per year. The permit shall allow Honda to apply a credit to emission calculations, for recovered materials, that have been properly tested for their OC content, and for which recordkeeping has been maintained, as per the terms in the permit. The drying ovens have been permitted along with their associated adhesive applications, in order to eliminate the need to demonstrate compliance with an estimated "booth-oven split" in emissions, since this process does not involve the "curing" of the adhesives applied.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

5 NEW SOURCE REVIEW FORM B

PTI Number: 01-06380

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FACILITY NAME Honda of America Manufacturing, Inc.

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CITY/TWP Marvsville

Emissions Unit ID: R022

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

OC

102.9

PE

6.5