



State of Ohio Environmental Protection Agency

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

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 01-06636

DATE: 6/18/2002

Honda of America Mfg., Inc.
Joanna Bambeck
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 **\$800** 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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install
Terms and Conditions

Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 01-06636

Application Number: 01-06636
APS Premise Number: 0180000130
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg., Inc.
Person to Contact: Joanna Bambeck
Address: 24000 Honda Parkway
Marysville, OH 43040-9190

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

Description of proposed emissions unit(s):
Oil washers for stamping presses and blanking lines.

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 Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06636

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.10 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.

12. 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.

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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. Termination of Permit To Install

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

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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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. 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).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

9. 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> |
|-------------------------|-----------------------------|
| VOC | 9.0 |
| PE | 4.82 |

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Facility ID: 0180000130

Hond

PTI A

Emissions Unit ID: K229

Issued: To be entered upon final issuance

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: K229

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> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| K229- Rust proofing and blank stamping line for metal coils and metal auto part blanks | OAC rule 3745-31-05(A)(3) | Volatile organic compounds (VOC) emissions shall not exceed 2.4 pounds per gallon for process materials, excluding water and exempt solvents. |
| | | Particulate emissions (PE) shall not exceed 2.41 tons per year from rust proofing and blank stamping operations. |
| | | The requirements of this rule also include compliance with the requirements of OAC rules OAC rules 3745-17-11(B)(1) and 3745-31-05(D). |
| | OAC rule 3745-31-05(D) | VOC emissions shall not exceed 4.0 tons per rolling, 12-month period, including clean up materials. |
| | OAC rule 3745-17-11(B)(1) | PE shall not exceed 0.551 pound per hour from rust proofing and blank stamping operations. |
| | OAC rule 3745-21-09(U)(2)(i) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

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

- 2.a** Compliance with the rolling, 12-month process and cleanup material usage (gallons/rolling 12-month period) and VOC emissions limitations shall be calculated based upon the actual process and cleanup material usage and VOC emissions from this emissions unit initially including the 12 month period prior to issuance of this permit and rolling with each passing month.
- 2.b** The hourly and annual PE emissions limits are based on the emissions unit's potential to emit; therefore; record keeping and reporting is not required to demonstrate compliance with these emissions limitations.

II. Operational Restrictions

1. The maximum annual process and cleanup material usage for this emissions unit shall not exceed 3,333 gallons, based upon a rolling, 12-month summation of the actual process and cleanup material usage.
2. The permittee has existing records of the amount of process and cleanup materials employed on this emissions unit; therefore, the first year of monthly, accumulating, process and cleanup material usage limitations are not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the name and identification of each VOC containing process and cleanup material employed;
 - b. the VOC content of each process and cleanup material, in pounds per gallon;
 - c. the number of gallons of each process and cleanup material employed;
 - d. the total VOC emissions from all process and cleanup materials employed, in pounds or tons;
 - e. the rolling, 12-month summation of the process and cleanup materials usage, in gallons; and
 - f. the rolling, 12-month total VOC emissions from process and cleanup materials.

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Emissions Unit ID: K229

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1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of any process materials, exceeding 2.4 pounds per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of rolling, 12-month usage limitation of 3,333 gallons of process and cleanup material.
3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the 4.0 tons per rolling, 12-month VOC limitation.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Term and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 4.0 tons per rolling, 12-month period from this emissions unit, including cleanup materials.

Applicable Compliance Method:
Compliance with this rolling, 12-month VOC limit for this emissions unit shall be determined through the requirements and record keeping contained in the terms above. Any recycle/recovery credit shall be calculated and applied. Formulation data or USEPA Method 24 shall be used to determine the VOC content. The monthly emissions from the materials used in this emissions unit shall be calculated and added to the emissions from the previous 11 months.
 - b. Emission Limitations:
VOC emissions shall not exceed 2.4 pounds per gallon of process materials applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the process material VOC content limit shall be determined through monthly recordkeeping of the VOC content for each process material used, less water and exempt solvents. Formulation data from the material manufacturer or USEPA Method 24

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shall be used to determine the VOC content of the materials.

- c. Process and cleanup usage limitation:
Process and cleanup material usage shall not exceed 3,333 gallons, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this rolling, 12-month process and cleanup material usage limit for this emissions unit shall be determined through the permit requirements and record keeping contained in the terms above.

- d. Emission limitations:
0.551 lb PE/hour and 2.41 tons PE/year

Applicable Compliance Method:

If required, compliance with the hourly and annual PE limit may be determined through a calculation using the monthly recordkeeping of process material usage, the maximum process

Honda**PTI A**

Emissions Unit ID: K229

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material in any hour, and the solids content of all process materials applied in this emissions unit. The solids content of the process materials shall be derived from formulation data from each manufacturer, and may be used to determine the worst-case particulate content of any coating. Potential controlled hourly emissions shall be calculated by multiplying the maximum PE content of any process material used in the emissions unit times the coating's maximum usage in any hour, times the transfer and control efficiencies. Calculations shall be documented as follows:

$$\text{PE/hr} = (\text{lbs PE/gal of coating}) \times (1 \text{ gal/hr}) \times (1 - \text{TE}) \times (1 - \text{CE}).$$

Annual emissions shall be calculated from actual coating/material usage, and may also be calculated using worst-case or actual coating solids content.

$$\text{Annual PE (in tons/yr)} = (\text{lbs PE/gal of coating}) \times (\text{coating usage in gal/year}) \times (1 - \text{TE}) \times (1 - \text{CE}) \times (1 \text{ ton}/2000 \text{ lbs}).$$

VI. Miscellaneous Requirements

None

**Honda
PTI A**

Emissions Unit ID: K229

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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> |
|--|--------------------------------------|--|
| K229- Rust proofing and blank stamping line for metal coils and metal auto part blanks | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

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Emissions Unit ID: K229

because this emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Honda
PTI A

Emissions Unit ID: K230

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> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| K230- Rust proofing and blank stamping line for metal coils and metal auto part blanks | OAC rule 3745-31-05(A)(3) | Volatile organic compounds (VOC) emissions shall not exceed 2.4 pounds per gallon for process materials, excluding water and exempt solvents. |
| | | Particulate emissions (PE) shall not exceed 2.41 tons per year from rust proofing and blank stamping operations. |
| | | The requirements of this rule also include compliance with the requirements of OAC rules OAC rules 3745-17-11(B)(1) and 3745-31-05(D). |
| | OAC rule 3745-31-05(D) | VOC emissions shall not exceed 4.0 tons per rolling, 12-month period, including clean up materials. |
| | OAC rule 3745-17-11(B)(1) | PE shall not exceed 0.551 pound per hour from rust proofing and blank stamping operations. |
| | OAC rule 3745-21-09(U)(2)(i) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

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

- 2.a** Compliance with the rolling, 12-month process and cleanup material usage (gallons/rolling 12-month period) and VOC emissions limitations shall be calculated based upon the actual process and cleanup material usage and VOC emissions from this emissions unit initially including the 12 month period prior to issuance of this permit and rolling with each passing month.
- 2.b** The hourly and annual PE emissions limits are based on the emissions unit's potential to emit; therefore; record keeping and reporting is not required to demonstrate compliance with these emissions limitations.

II. Operational Restrictions

1. The maximum annual process and cleanup material usage for this emissions unit shall not exceed 3,333 gallons, based upon a rolling, 12-month summation of the actual process and cleanup material usage.
2. The permittee has existing records of the amount of process and cleanup materials employed on this emissions unit; therefore, the first year of monthly, accumulating, process and cleanup material usage limitations are not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the name and identification of each VOC containing process and cleanup material employed;
 - b. the VOC content of each process and cleanup material, in pounds per gallon;
 - c. the number of gallons of each process and cleanup material employed;
 - d. the total VOC emissions from all process and cleanup materials employed, in pounds or tons;
 - e. the rolling, 12-month summation of the process and cleanup materials usage, in gallons; and
 - f. the rolling, 12-month total VOC emissions from process and cleanup materials.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of any process materials, exceeding 2.4 pounds per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of rolling, 12-month usage limitation of 3,333 gallons of process and cleanup material.
3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the 4.0 tons per rolling, 12-month VOC limitation.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Term and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
VOC emissions shall not exceed 4.0 tons per rolling, 12-month period from this emissions unit, including cleanup materials.

Applicable Compliance Method:

Compliance with this rolling, 12-month VOC limit for this emissions unit shall be determined through the requirements and record keeping contained in the terms above. Any recycle/recovery credit shall be calculated and applied. Formulation data or USEPA Method 24 shall be used to determine the VOC content. The monthly emissions from the materials used in this emissions unit shall be calculated and added to the emissions from the previous 11 months.

- b. Emission Limitations:
VOC emissions shall not exceed 2.4 pounds per gallon of process materials applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the process material VOC content limit shall be determined through monthly recordkeeping of the VOC content for each process material used, less water and exempt solvents. Formulation data from the material manufacturer or USEPA Method 24 shall be used to determine the VOC content of the materials.

- c. Process and cleanup usage limitation:
Process and cleanup material usage shall not exceed 3,333 gallons, based upon a rolling, 12-month summation.

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Applicable Compliance Method:

Compliance with this rolling, 12-month process and cleanup material usage limit for this emissions unit shall be determined through the permit requirements and record keeping contained in the terms above.

- d. Emission limitations:
0.551 lb PE/hour and 2.41 tons PE/year

Applicable Compliance Method:

If required, compliance with the hourly and annual PE limit may be determined through a calculation using the monthly recordkeeping of process material usage, the maximum process

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material in any hour, and the solids content of all process materials applied in this emissions unit. The solids content of the process materials shall be derived from formulation data from each manufacturer, and may be used to determine the worst-case particulate content of any coating. Potential controlled hourly emissions shall be calculated by multiplying the maximum PE content of any process material used in the emissions unit times the coating's maximum usage in any hour, times the transfer and control efficiencies. Calculations shall be documented as follows:

$$\text{PE/hr} = (\text{lbs PE/gal of coating}) \times (1 \text{ gal/hr}) \times (1-\text{TE}) \times (1-\text{CE}).$$

Annual emissions shall be calculated from actual coating/material usage, and may also be calculated using worst-case or actual coating solids content.

$$\text{Annual PE (in tons/yr)} = (\text{lbs PE/gal of coating}) \times (\text{coating usage in gal/year}) \times (1-\text{TE}) \times (1-\text{CE}) \times (1 \text{ ton}/2000 \text{ lbs}).$$

VI. Miscellaneous Requirements

None

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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> |
|--|--------------------------------------|--|
| K230- Rust proofing and blank stamping line for metal coils and metal auto part blanks | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

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because this emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| K231- Pre-plant shutdown, manual spray, metal blank rust proofing | OAC rule 3745-31-05(A)(3) | VOC emissions shall not exceed 3.0 pounds per gallon for process materials, excluding water and exempt solvents. |
| | OAC rule 3745-31-05(D) | The requirements of this rule also include compliance with the requirements of OAC rules OAC rule 3745-31-05(D). |
| | OAC rule 3745-21-09(U)(2)(i) | VOC emissions shall not exceed 1.0 ton per rolling, 12-month period, including clean up materials. |
| | | The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

2. Additional Terms and Conditions

- 2.a Compliance with the rolling, 12-month process and cleanup material usage (gallons/rolling 12-month period) and VOC emissions limitations shall be calculated based upon the actual process and cleanup material usage and VOC emissions from this emissions unit initially including the 12 month period prior to issuance of this permit and rolling with each passing month.

II. Operational Restrictions

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1. The maximum annual process and cleanup material usage for this emissions unit shall not exceed 660 gallons, based upon a rolling, 12-month summation of the actual process and cleanup material usage.
2. The permittee has existing records of the amount of process and cleanup materials employed on this emissions unit; therefore, the first year of monthly, accumulating, process and cleanup material usage limitations are not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the name and identification of each VOC containing process and cleanup material employed;
 - b. the VOC content of each process and cleanup material, in pounds per gallon;
 - c. the number of gallons of each process and cleanup material employed;
 - d. the total VOC emissions from all process and cleanup materials employed, in pounds or tons;
 - e. the rolling, 12-month summation of the process and cleanup materials usage, in gallons; and
 - f. the rolling, 12-month total VOC emissions from process and cleanup materials.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of any process materials, exceeding 3.0 pounds per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of rolling, 12-month usage limitation of 660 gallons of process and cleanup material.
3. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the 1.0 ton per rolling, 12-month VOC limitation.

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4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the General Term and Conditions.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 1.0 ton per rolling, 12-month period from this emissions unit, including cleanup materials.

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Applicable Compliance Method:

Compliance with this rolling, 12-month VOC limit for this emissions unit shall be determined through the requirements and record keeping contained in the terms above. Any recycle/recovery credit shall be calculated and applied. Formulation data or USEPA Method 24 shall be used to determine the VOC content. The monthly emissions from the materials used in this emissions unit shall be calculated and added to the emissions from the previous 11 months.

b. Emission Limitations:

VOC emissions shall not exceed 3.0 pounds per gallon of process materials applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the process material VOC content limit shall be determined through monthly recordkeeping of the VOC content for each process material used, less water and exempt solvents. Formulation data from the material manufacturer or USEPA Method 24 shall be used to determine the VOC content of the materials.

c. Process and cleanup usage limitation:

Process and cleanup material usage shall not exceed 660 gallons, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with this rolling, 12-month process and cleanup material usage limit for this emissions unit shall be determined through the permit requirements and record keeping contained in the terms above.

VI. Miscellaneous Requirements

None

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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> |
|---|--------------------------------------|--|
| K231- Pre-plant shutdown, manual spray, metal blank rust proofing | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit's maximum annual emissions for each toxic compound will be less than

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1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.