



State of Ohio Environmental Protection Agency

**RE: FINAL 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: 01-08502**

**DATE: 11/29/2001**

Honda of America Manufacturing, Inc.  
Joanna Bambeck  
24000 Honda Parkway  
Marysville, OH 43040-9190

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

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

**FINAL PERMIT TO INSTALL 01-08502**

Application Number: 01-08502  
APS Premise Number: 0180000130  
Permit Fee: **\$400**  
Name of Facility: Honda of America Manufacturing, 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 Pkwy**  
**Marysville, Ohio**

Description of proposed emissions unit(s):  
**Line 1 wheel well blackout.**

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

**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

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calendar quarters. See B.10 below if no deviations occurred during the quarter.

- 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

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 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.

**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.

**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**

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

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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 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.

#### **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**

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>
VOC	10.0
PM	1.6

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Honda

PTI A<sub>1</sub>

Issued: 11/29/2001

Emissions Unit ID: K227

**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

**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>	
K227 - Line 1 wheel well blackout	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)

OAC rule 3745-21-09(U)(1)

Honda  
PTI A<sub>1</sub>

**Issued: 11/29/2001**

Emissions Unit ID: K227

Applicable Emissions  
Limitations/Control  
Measures

The VOC content of the coatings employed in the wheel well, blackout application shall not exceed 0.6 pounds of VOC per gallon, as applied.

Particulate emissions (PE) from coating/blackout overspray shall not exceed 1.6 tons/yr.

VOC emissions shall not exceed 10.0 tons per year from the Line 1 and Line 2 wheel well blackout operations, emission units K227 and K228 together.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).

See production operational restriction, Section A.II.1 below.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-

31-05(A)(3).

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

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

**2. Additional Terms and Conditions****2.a** None**II. Operational Restrictions**

1. Line 1 and Line 2 wheel well blackout operations, K227 and K228 together, shall be included in the production Line 1 and Line 2 total rolling twelve-month production limit of 470,000 units (cars), measured at "assembly off" (AF Off). This federally enforceable production rate has previously been established in the auto Line 1/Line 2 paint permit, PTI #01-6743, and the Line 1/Line 2 window glass assembly permit, PTI#01-6045.
2. The permittee shall operate the fabric filter system whenever this emissions unit is in operation.
3. The cleanup material for the blackout operations is mostly water. Any miscellaneous cleanup or purge materials used for K227 and K228 shall be tracked, monitored, and reported as per the Paint Department's overall cleanup and purge material requirements in PTI #01-6743.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information at the end of each month:
  - a. the name and identification of each coating employed in the wheel well blackout process; and
  - b. the VOC content of each coating, as applied.
2. The permittee shall collect and record the following information each month from wheel well blackout coatings applied in emissions units K227 and K228 together:
  - a. the name and identification of each blackout coating employed\*;
  - b. the VOC content of each blackout coating, as applied, in pounds per gallon\*;
  - c. the number of gallons of each blackout coating employed (gal/month); and
  - d. the total VOC emissions from all blackout process coatings employed in emission units K227 and K228 together, in pounds or tons per month, i.e., summation of the products of each coating's usage, times each coating's VOC content (b) x (c).

**Issued**

Emissions Unit ID: K227

\* records are satisfied in Section A.III.1.

3. This facility shall maintain the following records, as of the last day of each calendar month, for production Lines 1 and 2, which includes K227 and K228 wheel well blackout operations:
  - a. the number of units (cars) produced on Lines 1 and 2, as measured at "assembly off" (units/month); and
  - b. the rolling, 12-month summation of units produced on Lines 1 and 2 together (cars per rolling 12 months).
4. 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 notify the Ohio EPA Central District Office in writing of any monthly record showing the use of noncomplying blackout coatings, exceeding 0.6 pounds of VOC per gallon, as applied. 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.
2. 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 following the end of the calendar month.
3. The permittee shall submit annual reports for emission units K227 and K228 which specify total VOC emissions from these two emission units for the previous calendar year. These reports shall be submitted by April 15 of each year. The reporting requirements for these emission units may be satisfied by including them in the annual Fee Emission Report.
4. The permittee shall submit quarterly deviation (excursion) reports which identify any monthly record showing an exceedance of the 12-month rolling production limitation of cars, on Lines 1 and 2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

**V. Testing Requirements**

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

1. Emission Limitation

0.6 lb VOC/gallon for any wheel well blackout coating, as applied

**Issued: 11/29/2001**Applicable Compliance Method

Compliance with this VOC limit shall be determined through monthly recordkeeping, as specified in Section A.III.1, of each blackout coating applied and the volatile organic compound content of each. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

2. Emission Limitation

10.0 tons VOC/year for emission units K227 and K228 together

Applicable Compliance Method

Compliance with this limit shall be determined through the monthly recordkeeping, as specified in Section A.III.2. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the blackout coatings, to be used in the calculation of emissions. This limit was established at the potential application of blackout coatings in these emission units, through the Line 1 and Line 2 operational restrictions on automobile production, found in synthetic minor PTIs #01-6743 and 01-6045. Potential emissions are based on the following calculation:

$470,000 \text{ units/rolling 12 months} \times 0.071 \text{ gallons/unit} \times 0.6 \text{ pounds of VOC/gallon} \times 1 \text{ ton}/2000 \text{ lbs} = 10.0 \text{ tons/yr}$

3. 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).

4. Emission Limitation

0.551 pounds particulate emissions/hr from coating overspray

**Issued**

Emissions Unit ID: K227

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.2, A.III.4, and A.IV.2 of Part III. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

5. Emission Limitation

1.6 tons particulate emissions/yr from coating overspray

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.2, A.III.4, and A.IV.2 of Part III and recordkeeping of the monthly usage of the coatings applied, and annual calculation of emissions.

**VI. Miscellaneous Requirements**

None

Issued: 11/29/2001

**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>
K227 - Line 1 wheel well blackout		

**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**

None

**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>	
K228 - Line 2 wheel well blackout	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)
	OAC rule 3745-21-09(U)(1)	

Applicable Emissions  
Limitations/Control  
Measures

The VOC content of the coatings employed in the wheel well, blackout application shall not exceed 0.6 pounds of VOC per gallon, as applied.

Particulate emissions (PE) from coating/blackout overspray shall not exceed 1.6 tons/yr.

VOC emissions shall not exceed 10.0 tons per year from the Line 1 and Line 2 wheel well blackout operations, emission units K227 and K228 together.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).

See operational restriction, Section A.II.1 below.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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

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

**2. Additional Terms and Conditions****2.a** None**II. Operational Restrictions**

1. Line 1 and Line 2 wheel well blackout operations, K227 and K228 together, shall be included in the production Line 1 and Line 2 total rolling twelve-month production limit of 470,000 units (cars), measured at "assembly off" (AF Off). This federally enforceable production rate has previously been established in the auto Line 1/Line 2 paint permit, PTI #01-6743, and the Line 1/Line 2 window glass assembly permit, PTI#01-6045.
2. The permittee shall operate the fabric filter system whenever this emissions unit is in operation.
3. The cleanup material for the blackout operations is mostly water. Any miscellaneous cleanup or purge materials used for K227 and K228 shall be tracked, monitored, and reported as per the Paint Department's overall cleanup and purge material requirements in PTI #01-6743.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information at the end of each month:
  - a. the name and identification of each coating employed in the wheel well blackout process; and
  - b. the VOC content of each coating, as applied.
2. The permittee shall collect and record the following information each month from wheel well blackout coatings applied in emissions units K227 and K228 together:
  - a. the name and identification of each blackout coating employed\*;
  - b. the VOC content of each blackout coating, as applied, in pounds per gallon\*;
  - c. the number of gallons of each blackout coating employed (gal/month); and
  - d. the total VOC emissions from all blackout process coatings employed in emission units K227 and K228 together, in pounds or tons per month, i.e., summation of the products of each coating's usage, times each coating's VOC content (b) x (c).

\* records are satisfied in Section A.III.1.

3. This facility shall maintain the following records, as of the last day of each calendar month, for production Lines 1 and 2, which includes K227 and K228 wheel well blackout operations:
  - a. the number of units (cars) produced on Lines 1 and 2, as measured at "assembly off"

(units/month); and

- b. the rolling, 12-month summation of units produced on Lines 1 and 2 together (cars per rolling 12 months).
4. 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 notify the Ohio EPA Central District Office in writing of any monthly record showing the use of noncomplying blackout coatings, exceeding 0.6 pounds of VOC per gallon, as applied. 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.
2. 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 following the end of the calendar month.
3. The permittee shall submit annual reports for emission units K227 and K228 which specify total VOC emissions from these two emission units for the previous calendar year. These reports shall be submitted by April 15 of each year. The reporting requirements for these emission units may be satisfied by including them in the annual Fee Emission Report.
4. The permittee shall submit quarterly deviation (excursion) reports which identify any monthly record showing an exceedance of the 12-month rolling production limitation of cars, on Lines 1 and 2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

#### **V. Testing Requirements**

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

1. Emission Limitation

0.6 lb VOC/gallon for any wheel well blackout coating, as applied

Applicable Compliance Method

Compliance with this VOC limit shall be determined through monthly recordkeeping, as specified in Section A.III.1, of each blackout coating applied and the volatile organic compound content of each. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

2. Emission Limitation

10.0 tons VOC/year for emission units K227 and K228 together

Applicable Compliance Method

Compliance with this limit shall be determined through the monthly recordkeeping, as specified in Section A.III.2. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the blackout coatings, to be used in the calculation of emissions. This limit was established at the potential application of blackout coatings in these emission units, through the Line 1 and Line 2 operational restrictions on automobile production, found in synthetic minor PTIs #01-6743 and 01-6045. Potential emissions are based on the following calculation:

$$470,000 \text{ units/rolling 12 months} \times 0.071 \text{ gallons/unit} \times 0.6 \text{ pounds of VOC/gallon} \times 1 \text{ ton}/2000 \text{ lbs} = 10.0 \text{ tons/yr}$$
3. 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).

4. Emission Limitation

0.551 pounds 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.2, A.III.4, and A.IV.2 of Part III. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified

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Honda

PTI A<sub>1</sub>

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Emissions Unit ID: K228

in OAC rule 3745-17-03(B)(10).

5. Emission Limitation

1.6 tons particulate emissions/yr from coating overspray

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.2, A.III.4, and A.IV.2 of Part III and recordkeeping of the monthly usage of the coatings applied, and annual calculation of emissions.

**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>
K228 - Line 2 wheel well blackout		

**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**

None