



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
UNION COUNTY
Application No: 01-08118
Fac ID: 0180000130**

CERTIFIED MAIL

DATE: 3/9/2006

Honda of America Mfg., Inc.
Stephen Fogle
24000 Honda Parkway
Marysville, OH 43040

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 200** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

UNION COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08118 FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America Mfg., Inc.**

On 3/9/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America Mfg., Inc.**, located at **24000 Honda Parkway, Marysville, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08118:

Weld Line 1 and 2.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08118

Application Number: 01-08118
Facility ID: 0180000130
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg., Inc.
Person to Contact: Stephen Fogle
Address: 24000 Honda Parkway
Marysville, OH 43040

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

Description of proposed emissions unit(s):
Weld Line 1 and 2.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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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 re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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.

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- 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 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 ninety (90) 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

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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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

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., postmarked), 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>
PM	0.52
OC	11.0

Honda of America Mfg., Inc.
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Facility ID: 0180000130

Hond:

PTI A_

Emissions Unit ID: P004

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

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PTI A

Emissions Unit ID: P004

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>
P004 - Weld Line 2: robotic & resistance welding, and organic material usage (below) in welding	OAC rule 3745-31-05(C)	Organic compound emissions shall not exceed 11.0 tons per rolling 12 months for welding operations on Line 1 (P330) and Line 2 (P004).
P004- Weld Line 2: MIG welding and brazing	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions shall not exceed 0.26 lb/hr and 0.52 ton/yr from Weld Line 1 & Line 2 together See Sections A.I.2.c and A.II.1.
Anti-spatter materials and cleaning solution usage	OAC rule 3745-31-05(A)(3)	Anti-spatter materials and cleaning solutions shall not exceed 4.3 lbs OC/gal.
Anti-spatter material and cleaning solution usage	OAC rule 3745-21-07(G)	Use of only non-photochemically reactive materials or materials exempt under 3745-21-07(G)(9) for non-coatings
Miscellaneous sealers/sealants and quality marker coating usage	OAC rule 3745-21-09(U)(2)(e)(iii)	Use of no more than 10 gallons/day of miscellaneous *sealers/sealants and quality marker coatings

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PTI A

Emissions Unit ID: P004

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* These sealers and sealants are not the same materials, nor the same application, as those permitted for use in emission units P005 and P200, the phosphate pretreatment processes.

2. Additional Terms and Conditions

- 2.a** This emissions unit shall use only nonphotochemically reactive materials or materials exempt per OAC 3745-21-07(G)(9) for non-coatings.
- 2.b** The maximum annual production rate for Line 1 and Line 2 shall not exceed 470,000 units (cars), based upon a the rolling, 12-month production of cars measured at the "AF Off".
- 2.c** The annual usage of MIG and brazing wire and rod shall not exceed 443,000 pounds per year on Line 1 and Line 2 together.

II. Operational Restrictions

- 1. The permittee shall minimize or eliminate visible particulate emissions through the installation and operation of collection hoods and fans at the point of emissions from the primary MIG welding. This collection system shall be vented to a baghouse having a collection efficiency of 90%, whenever the emissions unit is in operation. Capture efficiency at the point source of emissions shall be calculated at 85%, unless testing of the hood collection system demonstrates a different efficiency. Manual repair, mobile MIG welding, and the individual MIG robots on D Zone operations shall not require control.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for the welding operations:
 - a. the name and identification for each anti-spatter and cleaning solution employed; and
 - b. the organic compound content of each anti-spatter and cleaning solution, as applied.
- 2. The permittee shall collect and record the following information each day for the

welding operations:

- a. the name and identification for each miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material employed to the auto body or metal part;
- b. the volume, in gallons, of each miscellaneous sealer/sealant and quality marker coating employed; and
- c. the total volume, in gallons, of all miscellaneous sealers/sealants and quality marker coatings employed.

If the total use of these materials, in any single day, is less than 1 gallon per day, the material used need only be recorded in the daily record as <1 gallon. Monthly emissions shall be calculated using actual monthly usage inventory records, if monthly records prove more accurate than the sum of daily usage.

3. The permittee shall collect and record the following information each month for the welding operations:

- a. the number of gallons of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, miscellaneous organic material employed, and pounds (or tons) of MIG and brazing wire/rod consumed;
- b. the organic compound content of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material, in pounds per gallon;
- c. the total organic compound emissions from all cleaning solutions, anti-spatter materials, miscellaneous sealers/sealants, quality marker coatings, miscellaneous organic material usage, and the vaporization of rust preventive oils from spot welding, in pounds per month;
- d. the rolling 12-month production of automobiles, measured at the "AF Off" area; and
- e. the rolling 12-month OC emissions from welding operations on Line 1 and Line 2.

4. The permittee shall maintain records that document any time periods when the hood collection or fabric filter systems were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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PTI A

Emissions Unit ID: P004

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1. The permittee shall submit deviation (excursion) reports which include the following:
 - a. any monthly record or calculation showing an exceedance of the 12-month rolling OC emissions limit of 11.0 tons for Line 1 and Line 2 welding operations, and/or the rolling 12-month production of 470,000 units(cars) measured at the "AF Off";
 - b. any record showing an exceedance of the annual MIG brazing wire/rod usage of 443,000 pounds per year on welding Lines 1 and 2.
 - c. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9) for non-coatings, including an identification of the material used, it's composition, and the day(s) and duration of time the material was used.

Hond

PTI A

Emissions Unit ID: P004

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These exceedance reports shall be submitted as required in the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing the use of noncomplying (>4.3 lbs OC/gal) anti-spatter materials or cleaning solutions. 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.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the welding line employed more than 10 gallons per day of miscellaneous sealers/sealant(s) and quality marker coating(s) (together). The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.
4. The permittee shall notify the Ohio EPA Central District Office of any daily record showing that the hood collection system/fan and/or fabric filter were not in service when the emissions unit was in operation.
5. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Particulate emissions need not be reported, since the potential emissions for this emissions unit is under 1 ton per year from each line.

V. Testing Requirements

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

1. Emission Limitation

11.0 tons OC/yr for Line 1 and Line 2 welding operations

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of units produced, material usage, the organic compound content of each material used, calculation of the volatile emissions from rust protecting oils from the point of weld (calculated, as shown below), and the rolling 12-month summation of calculated OC emissions. Formulation data from the material's manufacturer or USEPA Method 24 shall be used to determine the organic compound

Emissions Unit ID: P004

content of the cleaning solutions, anti-spatter materials, sealers/sealants, quality marker coatings, and/or miscellaneous organic materials to be used in the calculation of emissions. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations, from the emissions unit, to the previous 11 month's emission calculations.

Organic compound emissions from the rust protectant oils at the point of weld, shall be calculated as follows:

Annual Emissions = Area of weld (PiR^2) or $(3.1416)(0.0328 \text{ ft})^2$ x amount of rust protective oil on metal sheet (275 mg/ft^2) x $(0.0022 \text{ lb/1000 mg})$ x $(3,000 \text{ welds/car})$ x $(500,000 \text{ units and parts on Lines 1 \& 2/yr})$ x (4 sides/weld) x $(1 \text{ ton/2000 lbs}) = 6.14 \text{ tons OC/year}$

Unless any of the variables in this equation change, the worst case emission calculations from the evaporation of rust-proofing oil(s) at the point of weld, above, shall be used to document the contribution of this source of OC emissions, to this limit.

2. Emission Limitation

0.26 lb particulate emissions/hr from both Lines 1 and 2
0.52 ton particulate emissions/yr from both Lines 1 and 2

Applicable Compliance Method

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of worst case emissions. To document the worst case emission rate for particulate matter, the following equations shall be used:

Hourly Emissions = [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] = 0.26 lbs particulate emissions/hour.

Annual Emissions = [actual or maximum MIG and brazing wire/rod usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [actual or maximum MIG wire usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs

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particulate emissions/pound of MIG wire) X fugitive emissions lost from the baghouse
(85%) x (100%-90%)] x [1 ton/2000 lbs] = 0.52 tons particulate emissions/yr.

VI. Miscellaneous Requirements

This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-759 issued June 27, 1990.

Hond

PTI A

Emissions Unit ID: P004

Issued: To be entered upon final issuance

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>
P004 - Weld Line 2: robotic & manual MIG & resistance welding, brazing, and organic material usage in welding	Ohio Air Toxics Policy	See Section B.III. below.

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 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 by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved 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" usage for this pollutant:

Pollutant: dipropylene glycol monomethyl ether

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TLV: 606 mg/m³

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Emissions Unit ID: P004

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Maximum Hourly Emission Rate: 6.43 lbs/hr from both welding Lines 1 and 2

Predicted 1-Hour Maximum Ground-Level Concentration: 1.401 mg/m³

MAGLC: 14.43 mg/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 (typically for coatings or cleanup materials), 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.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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- 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

None.

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Emissions Unit ID: P330

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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

- 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>
P330 - Weld Line 1: robotic & resistance welding, and organic material usage (below) in welding	OAC rule 3745-31-05(C)	Organic compound emissions shall not exceed 11.0 tons per rolling 12 months for welding operations on Line 1 (P330) and Line 2 (P004).
P330- Weld Line 1: MIG welding and brazing	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions shall not exceed 0.26 lb/hr and 0.52 ton/yr from Weld Line 1 & Line 2 together See Sections A.I.2.c and A.II.1.
Anti-spatter materials and cleaning solution usage	OAC rule 3745-31-05(A)(3)	Anti-spatter materials and cleaning solutions shall not exceed 4.3 lbs OC/gal.
Anti-spatter material and cleaning solution usage	OAC rule 3745-21-07(G)	Use of only non-photochemically reactive materials or materials exempt under 3745-21-07(G)(9) for non-coatings
Miscellaneous sealers/sealants and quality marker coating usage	OAC rule 3745-21-09(U)(2)(e)(iii)	Use of no more than 10 gallons/day of miscellaneous *sealers/sealants and quality marker coatings

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* These sealers and sealants are not the same materials, nor the same application, as those permitted for use in emission units P005 and P200, the phosphate pretreatment processes.

2. Additional Terms and Conditions

2.a This emissions unit shall use only nonphotochemically reactive materials or materials exempt per OAC 3745-21-07(G)(9) for non-coatings.

2.b The maximum annual production rate for Line 1 and Line 2 shall not exceed 470,000 units (cars), based upon a the rolling, 12-month production of cars measured at the "AF Off".

2.c The annual usage of MIG and brazing wire and rod shall not exceed 443,000 pounds per year on Line 1 and Line 2 together.

II. Operational Restrictions

1. The permittee shall minimize or eliminate visible particulate emissions through the installation and operation of collection hoods and fans at the point of emissions from the primary MIG welding. This collection system shall be vented to a baghouse having a collection efficiency of 90%, whenever the emissions unit is in operation. Capture efficiency at the point source of emissions shall be calculated at 85%, unless testing of the hood collection system demonstrates a different efficiency. Manual repair, mobile MIG welding, and the individual MIG robots on D Zone operations shall not require control.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the welding operations:
 - a. the name and identification for each anti-spatter and cleaning solution employed; and
 - b. the organic compound content of each anti-spatter and cleaning solution, as applied.

2. The permittee shall collect and record the following information each day for the welding operations:
 - a. the name and identification for each miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material employed to the auto body or metal part;
 - b. the volume, in gallons, of each miscellaneous sealer/sealant and quality marker coating employed; and
 - c. the total volume, in gallons, of all miscellaneous sealers/sealants and quality marker coatings employed.

If the total use of these materials, in any single day, is less than 1 gallon per day, the material used need only be recorded in the daily record as <1 gallon. Monthly emissions shall be calculated using actual monthly usage inventory records, if monthly records prove more accurate than the sum of daily usage.
3. The permittee shall collect and record the following information each month for the welding operations:
 - a. the number of gallons of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, miscellaneous organic material employed, and pounds (or tons) of MIG and brazing wire/rod consumed;
 - b. the organic compound content of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material, in pounds per gallon;
 - c. the total organic compound emissions from all cleaning solutions, anti-spatter materials, miscellaneous sealers/sealants, quality marker coatings, miscellaneous organic material usage, and the vaporization of rust preventive oils from spot welding, in pounds per month;
 - d. the rolling 12-month production of automobiles, measured at the "AF Off" area; and
 - e. the rolling 12-month OC emissions from welding operations on Line 1 and Line 2.
4. The permittee shall maintain records that document any time periods when the hood collection or fabric filter systems were not in service when the emissions unit was in operation.

IV. Reporting Requirements

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1. The permittee shall submit deviation (excursion) reports which include the following:
 - a. any monthly record or calculation showing an exceedance of the 12-month rolling OC emissions limit of 11.0 tons for Line 1 and Line 2 welding operations, and/or the rolling 12-month production of 470,000 units(cars) measured at the "AF Off";
 - b. any record showing an exceedance of the annual MIG brazing wire/rod usage of 443,000 pounds per year on welding Lines 1 and 2.
 - c. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9) for non-coatings, including an identification of the material used, it's composition, and the day(s) and duration of time the material was used.

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These exceedance reports shall be submitted as required in the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing the use of noncomplying (>4.3 lbs OC/gal) anti-spatter materials or cleaning solutions. 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.
3. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the welding line employed more than 10 gallons per day of miscellaneous sealers/sealant(s) and quality marker coating(s) (together). The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.
4. The permittee shall notify the Ohio EPA Central District Office of any daily record showing that the hood collection system/fan and/or fabric filter were not in service when the emissions unit was in operation.
5. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Particulate emissions need not be reported, since the potential emissions for this emissions unit is under 1 ton per year from each line.

V. Testing Requirements

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

1. Emission Limitation

11.0 tons OC/yr for Line 1 and Line 2 welding operations

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of units produced, material usage, the organic compound content of each material used, calculation of the volatile emissions from rust protecting oils from the point of weld (calculated, as shown below), and the rolling 12-month summation of calculated OC emissions. Formulation data from the material's manufacturer or USEPA Method 24 shall be used to determine the organic compound

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content of the cleaning solutions, anti-spatter materials, sealers/sealants, quality marker coatings, and/or miscellaneous organic materials to be used in the calculation of emissions. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations, from the emissions unit, to the previous 11 month's emission calculations.

Organic compound emissions from the rust protectant oils at the point of weld, shall be calculated as follows:

Annual Emissions = Area of weld (PiR^2) or $(3.1416)(0.0328 \text{ ft})^2$ x amount of rust protective oil on metal sheet (275 mg/ft^2) x $(0.0022 \text{ lb/1000 mg})$ x $(3,000 \text{ welds/car})$ x $(500,000 \text{ units and parts on Lines 1 \& 2/yr})$ x (4 sides/weld) x $(1 \text{ ton/2000 lbs}) = 6.14 \text{ tons OC/year}$

Unless any of the variables in this equation change, the worst case emission calculations from the evaporation of rust-proofing oil(s) at the point of weld, above, shall be used to document the contribution of this source of OC emissions, to this limit.

2. Emission Limitation

0.26 lb particulate emissions/hr from both Lines 1 and 2
0.52 ton particulate emissions/yr from both Lines 1 and 2

Applicable Compliance Method

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of worst case emissions. To document the worst case emission rate for particulate matter, the following equations shall be used:

Hourly Emissions = [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG and brazing wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] = 0.26 lbs particulate emissions/hour.

Annual Emissions = [actual or maximum MIG and brazing wire/rod usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [actual or maximum MIG wire usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X fugitive emissions lost from the baghouse

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$(85\%) \times (100\% - 90\%) \times [1 \text{ ton}/2000 \text{ lbs}] = 0.52 \text{ tons particulate emissions/yr.}$

VI. Miscellaneous Requirements

This Permit to Install (PTI) shall supercede the requirements for this emissions unit (then included in P004) in the PTI numbered 01-759 issued June 27, 1990.

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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>
P330 - Weld Line 1: robotic & manual MIG & resistance welding, brazing, and organic material usage in welding	Ohio Air Toxics Policy	See Section B.III below.

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 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 by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved 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" usage for this pollutant:

Pollutant: dipropylene glycol monomethyl ether

Honda of America Mfg., Inc.
PTI A
Issue

Facility ID: 0180000130

TLV: 606 mg/m³

Emissions Unit ID: P330

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Emissions Unit ID: P330

Issued: To be entered upon final issuance

Maximum Hourly Emission Rate: 6.43 lbs/hr from both welding Lines 1 and 2

Predicted 1-Hour Maximum Ground-Level Concentration: 1.401 mg/m³

MAGLC: 14.43 mg/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 (typically for coatings or cleanup materials), 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

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- 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

None.