

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **01-06641**

A. Source Description

Honda of America, Inc. (Honda), located in Marysville, OH, is a facility that manufactures automobiles and motorcycles. In April 1996, Honda submitted a Title V application for the facility.

B. Facility Emissions and Attainment Status

Honda is located in Union county which is considered attainment for all pollutants. Honda's potential to emit is much greater than 250 tons of OC/VOC per year. Since potential emissions are greater than 250 tons per year, the facility is considered major for PSD. Honda has requested that this permit be issued as a synthetic minor with federally enforceable limits on OC/VOC to avoid triggering the significance levels for PSD.

C. Source Emissions

The emissions unit will be permitted with a limit of 9.6 lb OC/gallon for coating metal motorcycle parts, 3.0 lb VOC/gallon for coating metal auto parts, 8 pounds/hr and 40 pound/day for coating non-metal parts using PRMs, and a combined annual limit for all coating applications of 2 tons OC/year.

D. Conclusion

Honda has requested that this permit be issued as a synthetic minor with federally enforceable restrictions on OC emissions of 2 tons, calculated using material usage and cleanup recovery on a rolling, 12-month basis. The OC emissions will be restricted by an emissions limitation on a rolling, 12-month basis. When photochemically reactive materials are applied, Honda shall comply with the 8 pounds/hour and 40 pounds/day OC limits contained in OAC rule 3745-21-07(G)(2).



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL
UNION COUNTY

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 01-06641

DATE: 8/1/2002

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

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$400 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

Michael W. Ahern

C: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 01-06641

Application Number: 01-06641
APS Premise Number: 0180000130
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg., Inc.
Person to Contact: Cory Sander
Address: 24000 Honda Parkway
Marysville, OH 43040-9190

Location of proposed air contaminant source(s) [emissions unit(s)]:

**24000 Honda Parkway
Marysville, Ohio**

Description of proposed emissions unit(s):

Miscellaneous repair.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

- 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.

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

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

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

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

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

3745-77-08(C)(3)(d).

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

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Termination of Permit To Install

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

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

5. Construction of New Sources(s)

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

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

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-06641

Issued: To be entered upon final issuance

facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.0

12

Honda of America Mfg., Inc.

PTI Application: 01-06641

Issued: To be entered upon final issuance

Facility ID: 0180000130

Hond

PTI A

Emissions Unit ID: K410

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

**Honda
PTI A**

Emissions Unit ID: K410

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>
K410- Motorcycle plant miscellaneous repair coating of metal and non-metal, motorcycle and automobile parts	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(D) OAC rule 3745-21-07(G)(2) OAC rule 3745-21-09(U)(1) OAC rule 3745-21-09(U)(1)(i)	OC emissions shall not exceed 9.6 lbs/gallon of coating, purge, reducing solvent, and cleanup materials applied, including water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(1)(i), 3745-21-09(U)(2)(i), and 3745-31-05(D). OC emissions shall not exceed 2.0 tons per rolling, 12-month period. See section 2.c. On any day when employing photochemically reactive coatings or cleanup materials to non-metal parts, emissions shall not exceed 8 lbs OC/hr and 40 lbs OC/day. When coating metal motorcycle parts, exempt pursuant to OAC rule 3745-21-09(U)(2)(i). When coating metal automobile parts, OC content of coatings employed shall not exceed 3.0 pounds of VOC/gallon when

Honda

PTI A

Emissions Unit ID: K410

Issued: To be entered upon final issuance

coating metal,

non-motorcycle parts.

2. Additional Terms and Conditions

2.a Compliance with the rolling, 12-month coating, purge, reducing solvent, and cleanup materials usage (gallons/rolling 12-months) and OC emissions limitations shall be calculated based upon the actual coating, purge, reducing solvent, and cleanup materials usage and OC emissions from this source initially including the 12 month period prior to issuance of this permit and rolling with each passing month.

2.b The maximum coating, purge solvent, reducing solvent, or cleanup solvent usage, for this emissions unit, shall not cause emissions to exceed 2.0 tons of OC per rolling 12 months, calculated using the following formula:

$$2.0 \text{ tons OC} \leq \sum_{n=1}^i \frac{(P_i) \times (OC_i)}{2000} - \frac{(R) \times (OC_R)}{2000}$$

where:

P_i = Usage of coating, purge solvent, reducing solvent, or cleanup solvent i in gallons or pounds;

OC_i = Organic compound content of coating, purge solvent, reducing solvent, or cleanup

solvent i in pounds per gallon or percent by weight;

R = Recovered material for credit on gallons or pounds;

OC_R = Organic compound content of recovered material in pounds per gallon or percent by weight.

II. Operational Restrictions

1. The permittee has existing records of the amount of coating, purge, reducing solvent, and cleanup materials employed on this emissions unit; therefore, the first year of accumulating coating, purge, reducing solvent, and cleanup materials usage monthly limitations are not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day when photochemically reactive chemicals are used for this emissions unit:
 - a. the company identification for each coating, purge, reducing solvent, and cleanup material employed, and the photochemically reactive status of each;

Honda of America Mfg., Inc.
PTI Application: 01-06641
Issued

Facility ID: 0180000130

Emissions Unit ID: K410

- b. the number of gallons or weight of each coating, purge, reducing solvent, and cleanup material employed;
 - c. the OC content of each coating, purge, reducing solvent, and cleanup material, in pounds per gallon or percent by weight;
 - d. the total OC emission rate for all coating, purge, reducing solvent, and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coating, purge, reducing solvent, and cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions for this emissions unit:
 - a. the company identification for each coating, purge, reducing solvent, and cleanup material employed;
 - b. the number of gallons or weight of each coating, purge, reducing solvent, and cleanup material employed;
 - c. the OC content of each coating, purge, reducing solvent, and cleanup material, in pounds per gallon or percent by weight;
 - d. the calculated total OC emission rate for all coating, purge, reducing solvent, and cleanup materials, in pounds or ton per month; and
 - e. the rolling, 12-month OC emissions.
3. During any period of time in which metal non-motorcycle parts are coated on this emissions unit, the permittee shall collect and record the following information at the end of each such month:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Central District Office Director in writing of any monthly record showing the use of noncomplying coatings, exceeding 3.0 pounds of VOC per gallon,

Issued: To be entered upon final issuance

when coating metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the use of non-complying coatings, greater than 9.6 pounds of OC per gallon.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month OC limit.
5. 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.
6. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
8 pounds OC/hour on any day when photochemically reactive materials are used.

Applicable Compliance Method:
Compliance with the coating, purge, reducing solvent, and cleanup material content and hourly OC emission limit when using photochemically reactive materials, shall be

Emissions Unit ID: K410

determined through daily recordkeeping of the coating, purge, reducing solvent, and cleanup material usage, the OC content of each material used, hours of operation, and the summation of the calculated OC emissions from each of these material as applied. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the OC content of the coatings, purge, reducing solvent, and cleaning materials to be used in the calculation of emissions. Hourly emissions may be calculated by multiplying the OC content of the coating, purge, reducing solvent, and cleanup materials used (lbs OC/gallon of material) times each materials' maximum usage in any hour (gallons/hr); or if the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented as follows:

$$\text{Potential hourly emissions (lb/hr)} = \sum_{n=1}^i (P_i) \times (OC_i)$$

where:

- P_i = Maximum hourly usage of coating, purge solvent, reducing solvent, or cleanup solvent i in gallons or pounds;
 OC_i = Organic compound content of coating, purge solvent, reducing solvent, or cleanup solvent i in pounds per gallon or percent by weight;

Or if the emissions unit has run at the same rate all day:

$$\text{Average hourly emissions (lb/hr)} = \frac{\sum_{n=1}^i (P_i) \times (OC_i)}{H}$$

where:

- P_i = Maximum hourly usage of coating, purge solvent, reducing solvent, or cleanup solvent i in gallons or pounds;
 OC_i = Organic compound content of coating, purge solvent, reducing solvent, or cleanup solvent i in pounds per gallon or percent by weight;
 H = Daily hours of operation of emissions unit.

- b. Emission Limitation:
 40 lbs OC/day on any day when photochemically reactive materials are used

Applicable Compliance Method:

Compliance with the daily OC emission limit, on any day when photochemically reactive materials are used, shall be determined through daily recordkeeping of the coating, purge, reducing solvent, and cleanup materials and photochemically reactive coating, purge, reducing solvent, and cleanup material usage, the OC content of each material used, the

Issued: To be entered upon final issuance

photochemically reactive status of all coating, purge, reducing solvent, and cleanup materials, hours of operation, and the summation of the calculated OC emissions from each of these material applied. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings, purge, and cleaning materials to be used in the calculation of emissions. Daily emissions shall be calculated and documented as follows:

$$\text{Daily emissions (lb/day)} = \sum_{n=1}^i (P_i) \times (OC_i)$$

where:

- P_i = Maximum daily usage of coating, purge solvent, reducing solvent, or cleanup solvent i in gallons or pounds;
 OC_i = Organic compound content of coating, purge solvent, reducing solvent, or cleanup solvent i in pounds per gallon or percent by weight.

- c. Emission Limitation:
2.0 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month OC limit shall be determined through monthly and 12-month, rolling recordkeeping of coating, purge, reducing solvent, and cleanup material usage; the OC content of each coating, purge, reducing solvent, and cleanup material used;

Honda of America Mfg., Inc.

PTI Application: 01-06641

Issued

Facility ID: 0180000130

Emissions Unit ID: K410

if a recovery credit is to be used, the materials collected for off-site recovery, recycle, and/or disposal; the calculated credit for recovery; and recordkeeping of the rolling, 12-month summation of calculated OC emissions. Any recycle/recovery credit shall be calculated and applied and formulation data from the coating, purge, reducing solvent, and cleanup material manufacturer or USEPA Method 24 shall be used to determine the OC content of the coating, purge, reducing solvent, and cleanup material, to be used in the calculation of emissions. Compliance test methods and procedures shall follow those specified in OAC rule 3745-21-10(B). The 12-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.

- d. Emission Limitation:
9.6 lbs OC/gallon for any coating applied to metal motorcycle parts

Applicable Compliance Method:

Compliance with this OC limit may be determined through monthly recordkeeping, as specified in Section III.2, of coating usage and the OC content of each coating applied to motorcycles or motorcycle parts. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coatings, to be used in the calculation of emissions.

- e. Emission Limitation:
3.0 lbs VOC/gallon for any coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C)

Applicable Compliance Method:

Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section III.3, of coating usage, and the volatile organic compound content of each coating applied to metal non-motorcycle parts that are not subject to OAC rule 3745-21-09(C). Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the OC content of the coatings, to be used in the calculation of emissions.

VI. Miscellaneous Requirements

None

**Honda
PTI A**

Emissions Unit ID: K410

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>
K410- Motorcycle plant miscellaneous repair coating of metal and non-metal, motorcycle and automobile parts	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Honda

PTI A

Emissions Unit ID: K410

Issued: To be entered upon final issuance

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

Honda**PTI A**

Emissions Unit ID: K410

Issued: To be entered upon final issuance

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