State of Ohio Environmental Protection Agency

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

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 01-08318

DATE: 4/5/2001

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

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **CDO**

FINAL PERMIT TO INSTALL 01-08318

Application Number:	01-08318
APS Premise Number:	0180000130
Permit Fee:	**$200**
Name of Facility:	Honda of America Manufacturing, Inc.
Person to Contact:	Cory Sander
Address:	24000 Honda Parkway Marysville, OH 43040-9190

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

Description of proposed emissions unit(s):
Line 2, powder application booths, bake oven and raw materials.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

11. Best Available Technology

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

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. Air Pollution Nuisance

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

5. Termination of Permit To Install

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

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

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

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

7. Public Disclosure

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

8. Applicability

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

emissions unit(s).

9. Construction Compliance Certification

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

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE	0.14
OC	13.3
NOx	3.3
CO	2.8

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
K402 - Two powder coating booths, MMP Line 2, with natural gas baking oven, for use on metal and plastic parts (Modification)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(A)(3), PTI #01-493
		OAC rule 3745-31-05(A)(3), PTI #01-493
		OAC rule 3745-21-07(G)(9)
		OAC rule 3745-31-05(D)
	OAC rule 3745-31-05(A)(3), PTI #01-493	
	OAC rule 3745-31-05(A)(3), PTI #01-493	OAC rule 3745-17-11(B)(1)

	Applicable Emissions Limitations/Control Measures	
		all coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 6.12 pounds of VOC per gallon.
OAC rule 3745-21-09(U)(1)	Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:	See A.I.2.a below.
OAC rule 3745-17-07(A)(1)	0.75 lb NOx/hr; 3.31 tons NOx/yr; 0.63 lb CO/hr; 2.78 tons CO/yr; 0.01 lb PE/hr (filterable); 0.04 ton PE/yr (filterable); 0.04 lb OC/hr; and 0.18 ton OC/yr.	OC emissions not to exceed 13.1 tons per rolling 12 months from coating and cleanup, calculated using the formula in section A.I.2.b below; and shall not exceed 22.2 lbs/hr. Particulate emissions from the coating's application, storage, and handling shall not exceed 0.10 ton of particulate emissions per year.
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-21-07(G)(9), 3745-31-05(A)(3), and 3745-31-05(D).	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D); and see A.II.1.
	MMP coating lines K401, K402, K403, and K404 together shall not exceed 296.4 tons of VOC per year.	None, Honda Motorcycle exempt pursuant to OAC rule 3745-21-09(U)(2)(i), when coating motorcycles.
	The average daily VOC content of the prime coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 7.6 pounds of VOC per gallon.	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	The average daily VOC content of the top coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 6.5 pounds of VOC per gallon.	
	The average annual VOC content of	

2. Additional Terms and Conditions

2.a This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).

Prior to employing any photochemically reactive materials in this emissions unit, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2.b The maximum coating and cleanup material usage, for this emissions unit, shall not cause emissions to exceed 13.1 tons of OC per rolling 12 months, calculated using the following formula:

$$13.1 \text{ tons OC} \geq \sum_{n=1}^{i} \frac{(P_i)x(OC_{pi})}{2000} + \frac{(S_j-S_r)\ x\ (OC_{sj})}{2000}$$

where:

P_i= Usage of powder coating *i* in pounds
OC_{pi}=Organic compound content of powder coat *i* in % by weight
S_j=Usage of cleanup material *j* in gallons
S_r=Recovery of cleanup material *j* in gallons
OC_{sj}=Organic compound content of clean-up material *j* in pounds per gallon

The credit for the recovered material shall be calculated proportionately according to this

emissions unit's OC contribution by volume to the drum or container to be sent off-site, as per Section A.2.c below.

2.c Net gallons and OC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. A composite sample of each shipment of recovered materials, including any cleanup and purge, shall be collected and tested (on or off-site), using USEPA Method 24, to determine the OC content. The OC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents. If K402's purge and cleanup materials are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered materials is used to show compliance with the 13.1 tons per rolling 12-month OC limit for K402 or the 296.4 ton per year facility limit for K401, K402, K403, and K404 together, the credit for the recovered material shall be calculated proportionately, according to each emissions units' OC contribution to the shipment, and records of the recovered material shall be maintained as required in Section A.III.1. No OC credit shall be calculated using a volume or weight of recovered material greater than that which was added to the recovery container(s) from the coating line(s) during any month, nor an OC concentration greater than the testing result(s) or MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used in the emissions unit" (materials collected from other emission units) shall also not be included in the credit to these emissions and

material use (gallons). A record shall be maintained of the date the recovery tank is emptied and recovered materials shipped. The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the same month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank.

2.d The powder coatings applied in this emissions unit shall not exceed an organic compound content of 12%, by weight.

II. Operational Restrictions

1. The powder coating operation shall not be operated without the use of the primary and secondary filters.

2. The powder coating line shall be run through two coating booths, built in series. Motorcycle bodies and/or parts shall be coated in only one of the two coating booths. A second color booth will reduce the amount of purge and cleanup materials needed for line color changes. Final touch-up or cleanup activities may be conducted in one booth after transferring production to the second booth. These additional activities shall be included in estimates of emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:

   a. the company identification for each coating and cleanup material employed;

   b. the number of gallons of each OC containing cleanup material and the pounds or tons of powder coating employed;

   c. documentation on the content of each material employed to show that only non-photochemically reactive materials or materials exempt under 3745-21-07(G)(9) are applied in

this emissions unit;

d. the total organic compound content of each coating and purge/cleanup material, in pounds per gallon or percent by weight of powder coating;

e. the calculated total organic compound emission rate for all coatings, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;

f. if a credit for recovered material is to be used, the total amount of purge and cleanup material collected and shipped for recycle/recovery and/or disposal at an outside facility, and the mass of OC to be credited to the calculations of the emissions, to demonstrate compliance with the limit(s) in Section A.I.1, tested and calculated as per Section A.I.2.c;

g. the net OC emissions from all cleanup/purge material employed, in pounds or tons per month;

h. the calculated OC emissions from all coatings and cleanup/purge material employed, in pounds or tons per month; and

i. the rolling 12-month organic compound emissions, calculated per the formula found in Section A.I.2.b.

2. The permittee shall maintain daily records that document any time periods when the primary and secondary filters were not in service when the emissions unit was in operation.

3. For each day when applying any prime coating exceeding 7.6 pounds of VOC per gallon on lines K401, K402, K403, and K404, the permittee shall collect and record the following information for the prime coatings applied in coating lines K401, K402, K403, and K404:

a. the name and identification number of each prime coating applied;

b. the VOC content of each prime coat applied;

c. the number of gallons of each prime coating applied; and

d. the average pounds of VOC per gallon of prime coating employed in emission units K401, K402, K403, and K404.

4. For each day when applying any top coating exceeding 6.5 pounds of VOC per gallon on lines K401, K402, K403, and K404, the permittee shall collect and record the following information for

the top coatings applied in coating lines K401, K402, K403, and K404:

a. the name and identification number of each top coating applied;

b. the VOC content of each top coat applied;

c. the number of gallons of each top coating applied; and

d. the average pounds of VOC per gallon of top coating employed in emission units K401, K402, K403, and K404.

5. The permittee shall collect and record the following information at the end of each year for the purpose of determining average annual VOC content of all coatings applied in emission units K401, K402, K403, and K404:

a. the name and identification of any additional coatings other than the top and prime coatings employed;

b. the VOC content of each coating employed, in pounds per gallon or percent by weight;

c. the total number of gallons of each coating and pounds or tons of powder coating employed;

d. a record of the powder coating density and the calculation of pounds or tons to gallons of powder coating;

e. the total gallons of all coatings employed during the year and total pounds of volatile organic compounds; and

f. the average VOC content per gallon of all coatings employed, calculated by dividing the total VOC by the total gallons {(both from (e)} applied in these emission units during the year, in pounds per gallon.

6. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions from emission units K401, K402, K403, and K404:

a. a record of each coating and cleanup material employed in emission units K401, K402, K403, and K404;

b. a record of the VOC content of each coating and cleanup material, in pounds per gallon and percent by weight powder coat;

c. a record of the number of gallons of each coating and cleanup material and pounds or tons of powder coating employed in emission units K401, K402, K403, and K404;

d. the total VOC emissions from all coatings and cleanup materials employed in emission units K401, K402, K403, and K404, prior to any credit for recovered materials, in tons;

e. a record of the total amount of VOC emissions (lbs or tons/yr) that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility during the year, summed from the monthly records of the credit from each shipment and calculated as per Section A.I.2.c; and

f. the total net VOC emissions from all coatings and cleanup materials employed in emission units K401, K402, K403, and K404 in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings, or materials not defined as those exempted under 3745-21-07(G)(9).

2. The permittee shall submit deviation (excursion) reports which identify any record showing an exceedance of the 12% by weight OC limit for the powder coatings applied in K402.

3. The permittee shall submit deviation (excursion) reports which identify any daily record showing an exceedance of the average daily VOC content of prime and top coatings applied in emissions units K401, K402, K403, and K404.

4. The permittee shall submit deviation (excursion) reports which identify any exceedance of the combined annual VOC limit for emission units K401, K402, K403, and K404, and/or annual average VOC content limit of the total coatings applied in emission units K401, K402, K403, and K404.

5. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the primary and/or secondary filtration systems were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

6. The permittee shall submit deviation (excursion) reports which identify any monthly record showing an exceedance of the rolling 12-month OC limit.

7. The permittee shall submit annual reports for emission units K401, K402, K403, and K404 which specify total OC emissions for each emission unit for the previous calendar year. These reports shall be submitted by April 15 of each year. The reporting requirements for an emission unit may be satisfied by including it in the annual Fee Emission Report.

8. These excursion reports are due by the date described in the General Terms and Conditions of this permit.

V. Testing Requirements

1. Emission Limitation

13.1 tons OC per rolling 12 months from coatings and cleanup materials

Compliance Method

Compliance with this limit shall be determined through 12-month rolling recordkeeping of coating, purge, and cleanup material usage; the organic compound content of each material, and the materials collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the total calculated OC emissions, using the formula specified in Section A.I.2.b. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

2. Emission Limitation

22.2 lbs OC/hr from powder coatings and cleanup materials

Compliance Method

Compliance with the hourly emission limitation shall be based on documentation of the worst case emissions and the recordkeeping requirements specified in Section A.III.1. Formulation data from the material's manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the coatings, purge, and cleanup materials. Since the powder coatings applied in this emissions unit shall not exceed 12%, by weight, organic compound content, no testing shall be required. The worst-case emissions from the maximum material usage, in any

hour, shall be documented per the following calculations:

2 gal/hr (in both booths together) x 6.8 lbs OC/gal = 13.60 lbs OC/hr from cleanup materials

71.3 lbs powder coating/hr x 12% OC = 8.56 lbs OC/hr from powder coatings

3. Emission Limit

Particulate emissions (PE) from the application, storage, and handling of powder coatings shall not exceed 0.10 ton of particulate emissions per year

Compliance Method

Particulate emissions from the application, storage, and handling of powder coatings shall be demonstrated by maintaining records of coating usage as per Section A.III.1. Control efficiency shall be calculated at 99.9% for the primary and secondary filters combined. Malfunction of the primary and/or secondary filters, while the emissions unit is in operation, shall be recorded and reported as required in Sections A.III.2 and A.IV.5. Worst case emissions shall be documented in the following formula:

208,000 lbs coating/yr X (100%-99.9% control) X 1 ton/2000 lbs = 0.10 tons PE/yr

4. Emission Limitation

Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed the following:

0.75 lb NOx/hr;
3.31 tons NOx/yr;
0.63 lb CO/hr;
2.78 tons CO/yr;
0.01 lb PE/hr (filterable);
0.04 ton PE/yr (filterable);
0.04 lb OC/hr; and
0.18 ton OC/yr

Applicable Compliance Method

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from two drying ovens (7,549 ft3/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft3) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

5. Emission Limitation

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

Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

6. Emission Limitation

296.4 tons VOC per year for emissions units K401, K402, K403, and K404

Applicable Compliance Method

Compliance with the annual VOC limit shall be determined through monthly recordkeeping of coating, purge, and cleanup material usage; the volatile organic compound content of each material, and the materials collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the total calculated VOC emissions. Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions. Compliance test methods and procedures shall follow those specified in OAC rule 3745-21-10(B).

7. Emission Limitation

7.6 lbs VOC/gallon of prime coating as a daily average and
6.5 lbs VOC/gallon of top coating as a daily average from K401, K402, K403, and K404

Applicable Compliance Method

Compliance with these daily average coating VOC limits from K401, K402, K403, and K404 coating lines shall be determined through daily recordkeeping of prime and top coatings when using any prime coat with a VOC content greater than 7.6 pounds of VOC per gallon and/or any topcoat greater than 6.5 pounds of VOC per gallon. On any such day, records shall be maintained of each coating's usage, the volatile organic compound content of each coating used, and the calculated average VOC content per gallon of prime and top coatings applied in these emission units. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to

determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

8. Emission Limitation

6.12 lbs VOC/gallon as a annual average VOC content from all coatings applied in emissions units K401, K402, K403, and K404

Applicable Compliance Method

Compliance with this annual average VOC limit shall be determined through recordkeeping of coating usage in each emissions unit, the volatile organic compound content of each coating used, and the calculated average VOC content per gallon of all coatings applied in these emission units. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

VI. Miscellaneous Requirements

This PTI (#01-08143) supercedes and replaces the requirements for this emissions unit K002, renumbered K402, in PTI #01-6702, issued 6/2/97.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K402 - Two powder coating booths, MMP Line 2, with natural gas baking oven, for use on metal and plastic parts (Modification)	Ohio Air Toxics Policy	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K402) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted over 1 ton per year, by this emissions unit, using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants at the fenceline:

Pollutant: caprolactam

TLV (mg/m3): 23 mg/m^3

Maximum Hourly Emission Rate: 7.84 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 68.23 ug/m^3

MAGLC : 547.6 ug/m^3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

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

Emissions Unit ID: K402

NEW SOURCE REVIEW FORM B

PTI Number: 01-08318 Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION Line 2, powder application booths, bake oven and raw materials. CITY/TWP Marysville

SIC CODE 3711 SCC CODE EMISSIONS UNIT ID K402

EMISSIONS UNIT DESCRIPTION Two powder coating booths, MMP Line 2, with natural gas baking oven, for use on metal and plastic parts

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM_{10}		NA	0.14	NA	0.14
Sulfur Dioxide					
Organic Compounds	Attainment	22.24	13.28	22.24	13.28
Nitrogen Oxides	Attainment	0.75	3.31	0.75	3.31
Carbon Monoxide	Attainment	0.63	2.78	0.63	2.78
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Caprolactam

Emissions Unit ID: K402

NEW SOURCE REVIEW FORM B

PTI Number: 01-08318 Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION Line 2, powder application booths, bake oven and raw materials. CITY/TWP Marysville

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

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000c.wpd	☒	
Modeling form/results	☐	0000000s.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000a.wpd	☐	☐
BAT Study	☐	0000000b.wpd	☐	☐
Other/misc.	☐	0000000t.wpd	☐	☐

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

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

NSR Discussion

Honda Motorcycle ***had*** submitted this application in order to remove the incinerator control from their powder coat operation, and to add a second booth to the emissions unit. The coating usage has decreased from the original PTI issued (PTI#01-6702), and the maximum content of OC and caprolactum ***had*** increased due to the anticipated use of additional colored powder(s), or a change in the worst-case emissions from additional powder coatings. ***This application was originally submitted and was issued draft as PTI #01-08143. Since the permit must be re-drafted due to the increase in emissions (below), a new PTI number has been assigned, and PTI#01-08143 is being replaced by this PTI and should be deleted from the PTI 2000 system or shown as replaced by PTI#01-8318.***

Re-draft Discussion

This permit is being re-drafted because of an increase in the emissions due to information submitted by the manufacturer of the powder coatings. These powder coatings are applied at temperature exceeding those used in Method 24, the method used to determine the OC/VOC content of normal coatings. When OC testing was conducted at these higher temperatures, it was found that emissions exceeded those submitted in the original application. The toxic (caprolactam) contained in the powder coatings also has increased, with the increase in the volatile content. The manufacturer has also submitted information demonstrating that the applicable TLV would be the "vapor" form of caprolactam (23 mg/m^3), rather than the "dust" form, TLV 1 mg/m^3, that was applied and modeled in the original toxics analysis in PTI #01-08143 and #01-6702. We are submitting this permit with these changes, and sending a revised model for caprolactam and the VOC emission calculations.

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

Emissions Unit ID: K402

NEW SOURCE REVIEW FORM B

PTI Number: 01-08318 Facility ID: 0180000130

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION	Line 2, powder application booths, bake oven and raw materials.	CITY/TWP	Marysville

☒ Synthetic Minor Determination and/or ☐ Netting Determination

Permit To Install ENTER PTI NUMBER HERE

A. Source Description

Honda of America, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April, 1996 Honda submitted a Title V application for the facility. This permit modification has been submitted by Honda's Marysville Motorcycle Plant in order to remove the incinerator control from a coating booth which has replaced solvent-borne coatings with powder coatings. The final permit to install, to replace solvent-borne coatings with powder coatings in this booth, was issued on 6/2/97, and startup for the powder coating operations was July 1997. Honda has submitted this application in order to remove the incinerator control, which was maintained on the emissions from the booth in order to eliminate Caprolactam, a toxic contained in the powder coatings at less than ***11%.***

B. Facility Emissions and Attainment Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons of OC (organic compounds) per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. Honda has requested that this permit be issued as a Synthetic Minor with federally enforceable limits on OC emissions. The limits for this emission unit are under PSD significant levels for OC, nitrogen oxides (NOx), particulate emissions (PE), sulfur dioxide (SO2), and carbon monoxide (CO).

C. Source Emissions

On 1/13/97 Honda submitted a permit modification for this coating source to replace solvent-borne coatings with powder coatings, which have a significantly lower OC content. Honda has proposed federally enforceable permit restrictions on emissions of OC in the amount of ***13.1*** tons, calculated in a formula using the coating and cleanup's OC content, and their usage and recovery on a rolling 12-month basis. Honda has requested restrictions on the OC content of the powder coatings applied, a maximum content of ***12%*** percent OC by weight, and a permit restriction to use only non-photochemically reactive materials, or materials exempt under OAC 3745-21-07(G)(9). The worst-case emissions, with these restrictions, would be ***13.1*** tons of OC per year from the powder coating and cleanup materials. Honda has maintained the incinerator control on the emissions from the booth in order to eliminate Caprolactam, a low TLV toxic contained in the powder coatings at less than ***11%***. After two years of operation, Honda has developed records of the maximum powder coating and cleanup usage rates and have submitted this application in order to remove the incinerator control. Because of the lower powder coating usage rate, caprolactam emissions comply with Ohio's Air Toxic Policy, and the incinerator control is not required. The Btu capacity of the drying ovens has been reduced (two of the three burners were replaced with one), however, carbon monoxide emissions show an increase due to the change of the emission factor in the new edition of AP-42. Powder coating records have established a lower coating usage rate than was originally permitted ***in PTI #01-6702; however, emissions have increase after powder coatings were tested using a modified Method 24, conducted at the temperature at which the powder coatings are applied (above those in Method 24).*** This permit application also includes the installation of an additional booth, so the line can coat either one of two colors of motorcycles, without the cleanup time and additional materials needed to make a

color change. The powder coating booths shall be operated using fabric filters with a control efficiency of 99.9% for particulate matter.

D. Conclusion

Honda has requested that the powder coating PTI be issued as a Synthetic Minor with federally enforceable permit restrictions on the OC emissions from the coating application, ***13.1*** tons, calculated using material usage and cleanup recovery on a rolling 12-month basis. Primary and secondary filters, with a total control efficiency of 99.9%, shall restrict particulate emissions to 0.1 tons per year from the powder coating's application, storage, and handling. The PTI will also provide restrictions on the organic compound content of the powder coatings used in this emission unit, ***12%*** OC content by weight. The permit includes the natural gas combustion in two small drying ovens serving this emissions unit, which includes limits of 3.31 tons of NOx, 2.78 tons of CO, and 0.18 tons of OC per rolling 12-months.

Best Available Technology (BAT) for source K402 will be the use of powder coatings with no more than ***12%*** by weight OC, and the use of only non-photochemically reactive coatings and cleanup materials, or materials exempt under OAC 3745-21-07(G)(9). Primary and secondary filters, with a total control of no less than 99.9%, shall be used to collect particulate matter from the powder coating's application, storage, and handling.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:
NONE

Please complete:

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

Pollutant	Tons Per Year
PE	0.10
OC	13.3
NOx	3.3
CO	2.8