



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

5/6/2011

Certified Mail

Paul Huwer  
Honda of America Mfg., Inc. Anna Engine Plant  
12500 Meranda Road  
Anna, OH 45302-9699

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0575000174  
Permit Number: P0107127  
Permit Type: Administrative Modification  
County: Shelby

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-SWDO; Indiana





## Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0575000174
Facility Name:	Honda of America Mfg., Inc. Anna Engine Plant
Facility Description:	Automobile manufacturing.
Facility Address:	12500 Meranda Road Anna, OH 45302-9699 Shelby County
Permit #:	P0107127, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sidney Daily News on 04/06/2011. The comment period ended on 05/06/2011.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Catalyst VOC content vs. usage.

a. Comment:

On pages 16 of 19 c) (2) we have an operational restriction for "the use of a binder catalyst VOC content that does not exceed 6.0 pounds per gallon. It also has the same reference to the VOC content of 6.0 pounds per gallon on page 17 of 19 e)(1)(b). - Honda currently uses "Isocure 700 Honda Catalyst" from Ashland Chemical as a catalyst in this source. This material is 100% Triethylamine - and has a VOC content of **6.05**lbs/gallon at 68 degrees F. On our permit application we show a maximum **usage** of **6.0** pounds per **hour** - which is probably where the confusion came from. If we get a VOC limit, I need it to be at least **6.05** pounds per **gallon** (or a usage limit of 6.0 lbs per hour)

b. Response:

ST&C's modified in order to address VOC content vs. usage rate. Rather than causing increased recordkeeping based on pounds used, ST&C's still maintain VOC content but adjusted testing under section f) to reflect gallons used and VOC content.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install**

for

Honda of America Mfg., Inc. Anna Engine Plant

Facility ID: 0575000174  
Permit Number: P0107127  
Permit Type: Administrative Modification  
Issued: 5/6/2011  
Effective: 5/6/2011





Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc. Anna Engine Plant

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## Authorization

Facility ID: 0575000174  
Facility Description: Automobile manufacturing.  
Application Number(s): M0001021  
Permit Number: P0107127  
Permit Description: PTI is to adjust to Federal Court decision on <10 ton emissions units need a BAT determination under existing SIP, add VOC emissions from Binder, and fugitive dust emissions.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 5/6/2011  
Effective Date: 5/6/2011

This document constitutes issuance to:

Honda of America Mfg., Inc. Anna Engine Plant  
12500 Meranda Road  
Anna, OH 45302-9699

of a Permit-to-Install for the emissions unit(s) identified on the following page.

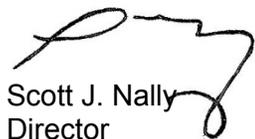
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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



Scott J. Nally  
Director



## **Authorization (continued)**

Permit Number: P0107127

Permit Description: PTI is to adjust to Federal Court decision on <10 ton emissions units need a BAT determination under existing SIP, add VOC emissions from Binder, and fugitive dust emissions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P097</b>
Company Equipment ID:	FC #3 Disc Core Machine
Superseded Permit Number:	05-14422
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

#### **4. Monitoring and Related Record Keeping 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:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

- (2) 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 Ohio EPA DAPC, Southwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. 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 Ohio EPA DAPC, Southwest District Office 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).

## 6. Compliance Requirements

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

- c) 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:
  - (1) 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.
  - (2) 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.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southwest District Office 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.
- 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 Ohio EPA DAPC, Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## 10. 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).

## 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

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).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. 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.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. 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.

**19. 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.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.

## **C. Emissions Unit Terms and Conditions**



**1. P097, FC #3 Disc Core Machine**

**Operations, Property and/or Equipment Description:**

FC Disc Core Machine 3, w/ scrubber primary control, aqueous binder, and organic parting spray

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of a scrubber control system that will minimize and/or eliminate the release of particulate emissions (PE) volatile organic compound (VOC) emissions.  Use of a baghouse to minimize and/or eliminate the release of particulate emissions (PE).  Hourly emissions shall not exceed the following:  1.87 pounds of VOC; and/or 0.36pounds of PE.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)b., below.
c.	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds per day, when "Photochemically Reactive Materials" (PRM) are employed.  See Section b)(2)c., d)(3), and e)(1), below.

d.	OAC rule 3745-17-11(B)(1) Table I	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05 (A)(3).
e.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) and particulate emissions (PE) emissions from this emissions unit since the emissions are less than ten tons per year.

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b(1)c., d)(3)g., d)(4)a., d)(4)b., d)(4)c., and d)(4)d., d)(4)e., d)(4)(f), and e)(1)f.

[OAC rule 3745-21-07]

d. The hourly PE and VOC emission limitations were established to reflect the maximum potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

## c) Operational Restrictions

- (1) The use of parting spray with a VOC content that does not exceed 6.74 pounds per gallon, as applied.
- (2) The use of binder catalyst VOC content that does not exceed 6.1 pounds per gallon.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

- (2) The permittee shall properly operate, and maintain the wet scrubber while the emissions unit is in operation. The wet scrubber shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record information that either demonstrates that the wet scrubber is being operated in accordance with the manufacturer's recommendations, instructions, and operating manual(s) and/or any problems and corrections that are being made.

The permittee shall maintain daily records of any time that the baghouse and/or wet scrubber was not employed at the time that this emissions unit was processing materials.

- (3) This facility shall maintain the following daily records if any photochemically reactive materials are used in this emissions unit.
  - a. if any material employed is by definition "Photochemically Reactive", the amount of each material employed, in gallons;
  - b. if any material employed is by definition "Photochemically Reactive", the organic compound content of each material employed, in lbs/gal;
  - c. if any material employed is by definition "Photochemically Reactive", the organic compound (OC) emissions of each material employed, in lbs of OC/day ("a" x "b"); and
  - d. if any material employed is by definition "Photochemically Reactive", the total OC emissions from all materials employed, in lbs of OC/day (sum of all "c").

- (4) This facility shall maintain the following monthly records on the parting spray employed in this emissions unit:

- a. The name and/or identification of each parting spray and/or binder catalyst employed; and
- b. The VOC content of each parting spray and/or binder catalyst employed, in pounds per gallon, as applied.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. an identification use of parting sprays with a VOC content that does exceeds 6.74 pounds per gallon, as applied;
  - b. an identification use of binder catalyst with a VOC content that does exceeds 6.1 pounds per gallon;
  - c. an identification any daily OC emissions that exceeded 40 pounds when "Photochemical Reactive Material " (PRM) parting sprays are employed; and/or
  - d. identify the all periods of time in which this emissions unit was in operation and the baghouse(s) was not being employed and/or the pressure drop across the baghouse(s) did not comply with the allowable range;
  - e. identify the all periods of time in which this emissions unit was in operation and the wet scrubber was not being employed and/or was not calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)].

f) Testing Requirements

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:  
1.87 lb of VOC emissions/hr

The hourly OC emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$HER = (Pu \times Vc) + \{(Cu \times Cv) \times [1 - (Cpe \times CES)]\} + (Su \times BEF)$$

Where

HER = Hourly emission rate, in lbs of OC/hr;

Pu = Part Spray usage rate, in gallons per hour, (0.2 gallons per hour, from Honda of America's PTI application and Emissions Activity form);

Vc = VOC content of parting spray, in pounds per gallon, (6.74 pounds of VOC per gallon of parting spray, from Honda of America's PTI Application and Emission Activity Form);

Cu = Catalyst usage, in gallons per hour, (1.0, approximate usage based on binder actual binder usage being 6 pounds per hour);

Cv = Binder VOC content, in pounds per gallon, (6.1, worst case based on Honda of America's draft PTI comments);

Cpe = Capture efficiency, in percent captured, (99%, from Honda of America's PTI application and Emissions Activity form);

Ces = Control efficiency for the scrubber, in percent removed, (95%, from Honda of America's PTI application and Emissions Activity form);

Su = Sand Used per hour (1.33 tons/hr); and

BEF = Binder emission factor (0.127 lbs VOC/Ton sand – from OCMA VOC Study)

$HER = (0.2 \text{ gal/hr} \times 6.74 \text{ pounds per gallon}) + \{(1.0 \text{ gallons per hour} \times 6.1 \text{ pounds per gallon}) \times [1 - (99\% \text{ capture} \times 95\% \text{ controlled})]\} + (1.33 \text{ tons of sand} \times 0.127 \text{ pounds emitted per ton of sand employed})$

HER = 1.87 pounds of VOC emitted per hour

Applicable Compliance Method:

Compliance will be assumed based on the use of parting spray with a VOC content not to exceed 6.75 pounds per gallon, as applied, and the use of the wet scrubber to reduce and minimize the release of VOC from this operation, and the recordkeeping in sections d)(2) and (4) of this permit.

If required, the permittee shall demonstrate formulation data or USEPA Method 24 shall be used to determine the VOC content of the materials employed and Method 18, 25, and/or alternative method or methods that have been reviewed and approved by the Ohio SWDO and/or CO to determine compliance with hourly emission limitation.

b. Emission Limitation:

0.36 lbs of PE/hr

Above hourly potential PE is based on the following equation:

$$\text{HER} = [(\text{Bhe} \times \text{Af} \times 60 \times 1.43\text{E to } -4) + (\text{Su} \times \text{PEF} \times \text{CCAP} \times \text{BCAP})]$$

Where:

HER = Hourly Emission Rate, in pounds per hour;

Bhe = Baghouse 2 emission rate, in grains per minute, (0.004 grains per standard dry cubic feet, from Honda of America's PTI application and Emissions Activity form); and

Af = Maximum Air Flow to Baghouse 2, in standard cubic feet per minute. (10,000 cubic feet per minute, from Honda of America's PTI application and Emissions Activity form).

Su = Sand Used per hour (1.33 tons/hr)

BEF = Particulate Emission Factor (3.6 lbs PE/Ton – Fire 6.23 SCC ID 30400350)

CCAP – Capture Efficiency of Baghouse (99%)

BCAP = Building Capture Efficiency (70%)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.