



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL**

**UNION COUNTY**

**Application No: 01-12222**

**Fac ID: 0180000156**

**DATE: 4/29/2008**

Honda R and D Americas  
Stephen Stutz  
21001 St Rt 739  
Raymond, OH 43067

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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 of the Director is final 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 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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

CDO



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Permit To Install  
Terms and Conditions

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Issue Date: 4/29/2008  
Effective Date: 4/29/2008

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**FINAL PERMIT TO INSTALL 01-12222**

Application Number: 01-12222  
Facility ID: 0180000156  
Permit Fee: **\$800**  
Name of Facility: Honda R and D Americas  
Person to Contact: Stephen Stutz  
Address: 21001 St Rt 739  
Raymond, OH 43067

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**21001 St Rt 739**  
**Raymond, Ohio**

Description of proposed emissions unit(s):  
**Four new transmission dynamometers in building 14.**

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

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

## **2. Scheduled Maintenance/Malfunction Reporting**

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

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

**4. Title IV Provisions**

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

**5. Severability Clause**

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

**6. General Requirements**

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

**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

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.

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**Honda R and D Americas**

**PTI Application: 01-12222**

**Issued: 4/29/2008**

**Facility ID: 0180000156**

### **13. Permit-To-Install**

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

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

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

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

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

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install.

The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	47.6

**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 - (B035) - Building 14 - Transmission Dynamometer 1 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section A.2.a below.
OAC rule 3745-31-05(A)(3)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  2.70 lbs of carbon monoxide (CO)/hr 11.9 tons of CO/yr  See Section II.2 below.
OAC rule 3745-21-08(B)	See Section A.I.2.b below.
OAC rule 3745-17-07(A)	See Section A.I.2.d below.
OAC rule 3745-17-11(B)(5)	0.310 pound particulate per million Btu of actual heat input for a stationary small internal combustion engine.
OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
40 CFR 63, Subpart P P P P P	See Section II.1 below.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) does not apply to PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions from this air contaminant source since the controlled potential to emit for PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions are less than ten tons per year.

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to 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 OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The CO emission limitation specified in Section A.I.1. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this emission limitation.
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.e** In accordance with 40 CFR 63.9290(d)(4), this emissions unit is excluded from the requirements of 40 CFR Part 63, Subpart PPPPP because the dynamometer will be operated for transmission testing only.

## **II. Operational Restrictions**

1. The emissions unit shall be operated to test engine driven transmissions only.
2. Emissions shall be vented to a thermal incinerator or alternative control device with a 98% destruction efficiency, when the emissions unit is in operation.

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

1. If an alternative emission control device is employed, the permittee shall develop and submit to Ohio EPA (if requested) an operational manual within 30-days of commencing operation of this emission unit. The permittee shall operate and maintain the alternative control device according to manufacture's specifications.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period ( or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

No earlier than 6 months from issuance of this permit, the permittee may modify the frequency of the visible particulate emissions checks to quarterly if no visible emissions have been observed in the previous 6 months. Such modified visible particulate emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(1) of OAC rule 3745-77-08.

3. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

4. The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

5. For each day during which the permittee operates the emissions unit to test anything other than engine driven transmissions, the permittee shall maintain a record of the type of test and duration of the testing.
6. If an alternative emissions control device is employed, the permittee shall collect and record:
  - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation; and
  - b. Any deviations (as defined in the operations manual) from the operating parameters that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance. The operating parameters used to demonstrate compliance should be approved by the Ohio EPA, Central District Office.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the total emissions of CO from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stacks serving the uncontrolled dynamometers and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly summaries that identify:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer or alternative control device, or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. any deviations (as defined in the operations manual) from the operating parameters of an alternative control device that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance and approved by the Ohio EPA, Central District Office.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall submit deviation (excursion) reports that identify each day during which the emissions unit is operated to test anything other than engine driven transmissions. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I.1 of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

2.7 lbs of CO/hr and 11.9 tons of CO/yr

Applicable Compliance Method:

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 3940 lb CO/1000 gal of gasoline and a maximum gasoline usage of 23 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System (FIRE6.01) for criteria pollutants

using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly emission rate (2.70 lbs/hr) by 8760 hours per year.

Controlled emissions shall be calculated as follows:

hourly emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} = 90.62 \text{ lbs of CO/hr}$

fugitive emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.99) = 0.91 \text{ lbs of CO/hr}$

stack emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.98) = 1.8 \text{ lbs of CO/hr}$

annual emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $= 396.92 \text{ tons per year}$

fugitive emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 3.97 \text{ ton of CO/yr}$

stack emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 7.93 \text{ ton of CO/yr}$

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO. This limitation includes both fugitive and stack emissions (fugitive emissions are assumed to be 1% based on emissions testing conducted on similar emissions unit B027 on May 11-13, 2004).
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10. Alternative ISAPI-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the Submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

b. Emission Limitation:

0.310 lbs particulate/ mmBtu.

Applicable Compliance Method:

The emission limit of 0.310 lbs particulate/ mmBtu was determined using the emission factor from AP-42, 5<sup>th</sup> edition, Table 3.31 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.

**VI. Miscellaneous Requirements**

None

**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 - (B035) - Building 14 - Transmission Dynamometer 1 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**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 - (B036) - Building 14 - Transmission Dynamometer 2 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section A.2.a below.
OAC rule 3745-31-05(A)(3)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  2.70 lbs of carbon monoxide (CO)/hr 11.9 tons of CO/yr  See Section II.2 below.
OAC rule 3745-21-08(B)	See Section A.1.2.b below.
OAC rule 3745-17-07(A)	See Section A.1.2.d below.
OAC rule 3745-17-11(B)(5)	0.310 pound particulate per million Btu of actual heat input for a stationary small internal combustion engine.
OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
40 CFR 63, Subpart P P P P P	See Section II.1 below.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) does not apply to PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions from this air contaminant source since the controlled potential to emit for PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions are less than ten tons per year.

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to 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 OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The CO emission limitation specified in Section A.I.1. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this emission limitation.
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.e** In accordance with 40 CFR 63.9290(d)(4), this emissions unit is excluded from the requirements of 40 CFR Part 63, Subpart P P P P P because the dynamometer will be operated for transmission testing only.

## **II. Operational Restrictions**

1. The emissions unit shall be operated to test engine driven transmissions only.
2. Emissions shall be vented to a thermal incinerator or alternative control device with a 98% destruction efficiency, when the emissions unit is in operation.

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

1. If an alternative emission control device is employed, the permittee shall develop and submit to Ohio EPA (if requested) an operational manual within 30-days of commencing operation of this emission unit. The permittee shall operated and maintain the alternative control device according to manufacture's specifications.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the

stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period ( or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

No earlier than 6 months from issuance of this permit, the permittee may modify the frequency of the visible particulate emissions checks to quarterly if no visible emissions have been observed in the previous 6 months. Such modified visible particulate emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(1) of OAC rule 3745-77-08.

3. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in

accordance with the manufacturer's recommendations, instructions, and the operating manual.

4. The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
  - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

5. For each day during which the permittee operates the emissions unit to test anything other than engine driven transmissions, the permittee shall maintain a record of the type of test and duration of the testing.
6. If an alternative emissions control device is employed, the permittee shall collect and record:
  - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation; and
  - b. Any deviations (as defined in the operations manual) from the operating parameters that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance. The operating parameters used to demonstrate compliance should be approved by the Ohio EPA, Central District Office.

#### **IV. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total emissions of CO from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stacks serving the uncontrolled dynamometers and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly summaries that identify:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer or alternative control device, or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. any deviations (as defined in the operations manual) from the operating parameters of an alternative control device that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance and approved by the Ohio EPA, Central District Office.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall submit deviation (excursion) reports that identify each day during which the emissions unit is operated to test anything other than engine driven transmissions. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I.1 of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:

2.7 lbs of CO/hr and 11.9 tons of CO/yr

Applicable Compliance Method:

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 3940 lb CO/1000 gal of gasoline and a maximum gasoline usage of 23 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System (FIRE6.01) for criteria pollutants using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly emission rate (2.70 lbs/hr) by 8760 hours per year.

Controlled emissions shall be calculated as follows:

hourly emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} = 90.62 \text{ lbs of CO/hr}$

fugitive emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.99) = 0.91 \text{ lbs of CO/hr}$

stack emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.98) = 1.8 \text{ lbs of CO/hr}$

annual emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 396.92 \text{ tons per year}$

fugitive emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 3.97 \text{ ton of CO/yr}$

stack emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 7.93 \text{ ton of CO/yr}$

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO. This limitation includes both fugitive and stack emissions (fugitive emissions are assumed to be 1% based on emissions testing conducted on similar emissions unit B027 on May 11-13, 2004).
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10. Alternative ISAPI-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the Submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

b. Emission Limitation:

0.310 lbs particulate/ mmBtu.

Applicable Compliance Method:

The emission limit of 0.310 lbs particulate/ mmBtu was determined using the emission factor from AP-42, 5<sup>th</sup> edition, Table 3.31 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.

**VI. Miscellaneous Requirements**

None

**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 - (B036) - Building 14 - Transmission Dynamometer 2 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**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 - (B037) - Building 14 - Transmission Dynamometer 3 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section A.2.a below.
OAC rule 3745-31-05(A)(3)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  2.70 lbs of carbon monoxide (CO)/hr 11.9 tons of CO/yr  See Section II.2 below.
OAC rule 3745-21-08(B)	See Section A.I.2.b below.
OAC rule 3745-17-07(A)	See Section A.I.2.d below.
OAC rule 3745-17-11(B)(5)	0.310 pound particulate per million Btu of actual heat input for a stationary small internal combustion engine.
OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
40 CFR 63, Subpart P P P P P	See Section II.1 below.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) does not apply to PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions from this air contaminant source since the controlled potential to emit for PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions are less than ten tons per year.

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to 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 OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The CO emission limitation specified in Section A.I.1. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this emission limitation.
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.e** In accordance with 40 CFR 63.9290(d)(4), this emissions unit is excluded from the requirements of 40 CFR Part 63, Subpart P PPPP because the dynamometer will be operated for transmission testing only.

## **II. Operational Restrictions**

1. The emissions unit shall be operated to test engine driven transmissions only.
2. Emissions shall be vented to a thermal incinerator or alternative control device with a 98% destruction efficiency, when the emissions unit is in operation.

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

1. If an alternative emission control device is employed, the permittee shall develop and submit to Ohio EPA (if requested) an operational manual within 30-days of commencing operation of this emission unit. The permittee shall operated and maintain the alternative control device according to manufacture's specifications.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions

**Honda R and D Americas**

**PTI Application: 01-12222**

**Issued: 4/29/2008**

**Facility ID: 0180000156**

**Emissions Unit ID: B037**

shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period ( or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

No earlier than 6 months from issuance of this permit, the permittee may modify the frequency of the visible particulate emissions checks to quarterly if no visible emissions have been observed in the previous 6 months. Such modified visible particulate emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(1) of OAC rule 3745-77-08.

3. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
4. The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within

the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

5. For each day during which the permittee operates the emissions unit to test anything other than engine driven transmissions, the permittee shall maintain a record of the type of test and duration of the testing.
6. If an alternative emissions control device is employed, the permittee shall collect and record:
  - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation; and
  - b. Any deviations (as defined in the operations manual) from the operating parameters that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance. The operating parameters used to demonstrate compliance should be approved by the Ohio EPA, Central District Office.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the total emissions of CO from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stacks serving the uncontrolled dynamometers and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly summaries that identify:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer or alternative control device, or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. any deviations (as defined in the operations manual) from the operating parameters of an alternative control device that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance and approved by the Ohio EPA, Central District Office.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall submit deviation (excursion) reports that identify each day during which the emissions unit is operated to test anything other than engine driven transmissions. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I.1 of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
2.7 lbs of CO/hr and 11.9 tons of CO/yr  
  
Applicable Compliance Method:

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 3940 lb CO/1000 gal of gasoline and a maximum gasoline usage of 23 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System (FIRE6.01) for criteria pollutants using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly emission rate (2.70 lbs/hr) by 8760 hours per year.

Controlled emissions shall be calculated as follows:

hourly emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} = 90.62 \text{ lbs of CO/hr}$

fugitive emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.99) = 0.91 \text{ lbs of CO/hr}$

stack emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.98) = 1.8 \text{ lbs of CO/hr}$

annual emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 396.92 \text{ tons per year}$

fugitive emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 3.97 \text{ ton of CO/yr}$

stack emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 7.93 \text{ ton of CO/yr}$

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO. This limitation includes both fugitive and stack emissions (fugitive emissions are assumed to be 1% based on emissions testing conducted on similar emissions unit B027 on May 11-13, 2004).
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10. Alternative ISAPI-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the Submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

b. Emission Limitation:

0.310 lbs particulate/ mmBtu.

Applicable Compliance Method:

The emission limit of 0.310 lbs particulate/ mmBtu was determined using the emission factor from AP-42, 5<sup>th</sup> edition, Table 3.31 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.

**VI. Miscellaneous Requirements**

None

**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 - (B037) - Building 14 - Transmission Dynamometer 3 controlled by a thermal incinerator or alternative control device**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**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 - (B038) - Building 14 - Transmission Dynamometer 4 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section A.2.a below.
OAC rule 3745-31-05(A)(3)	Emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  2.70 lbs of carbon monoxide (CO)/hr 11.9 tons of CO/yr  See Section II.2 below.
OAC rule 3745-21-08(B)	See Section A.I.2.b below.
OAC rule 3745-17-07(A)	See Section A.I.2.d below.
OAC rule 3745-17-11(B)(5)	0.310 pound particulate per million Btu of actual heat input for a stationary small internal combustion engine.
OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
40 CFR 63, Subpart P P P P P	See Section II.1 below.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) does not apply to PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions from this air contaminant source since the controlled potential to emit for PE, NO<sub>x</sub>, SO<sub>2</sub>, and OC emissions are less than ten tons per year.

- 2.b** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to 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 OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.c** The CO emission limitation specified in Section A.I.1. reflect the emission unit's potential to emit for this pollutant. Therefore, it is not necessary to develop additional monitoring, recordkeeping, and/or reporting requirements to ensure compliance with this emission limitation.
- 2.d** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.e** In accordance with 40 CFR 63.9290(d)(4), this emissions unit is excluded from the requirements of 40 CFR Part 63, Subpart P P P P P because the dynamometer will be operated for transmission testing only.

## **II. Operational Restrictions**

1. The emissions unit shall be operated to test engine driven transmissions only.
2. Emissions shall be vented to a thermal incinerator or alternative control device with a 98% destruction efficiency, when the emissions unit is in operation.

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

1. If an alternative emission control device is employed, the permittee shall develop and submit to Ohio EPA (if requested) an operational manual within 30-days of commencing operation of this emission unit. The permittee shall operated and maintain the alternative control device according to manufacture's specifications.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions

shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period ( or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

No earlier than 6 months from issuance of this permit, the permittee may modify the frequency of the visible particulate emissions checks to quarterly if no visible emissions have been observed in the previous 6 months. Such modified visible particulate emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(1) of OAC rule 3745-77-08.

3. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
4. The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within

the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

5. For each day during which the permittee operates the emissions unit to test anything other than engine driven transmissions, the permittee shall maintain a record of the type of test and duration of the testing.
6. If an alternative emissions control device is employed, the permittee shall collect and record:
  - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation; and
  - b. Any deviations (as defined in the operations manual) from the operating parameters that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance. The operating parameters used to demonstrate compliance should be approved by the Ohio EPA, Central District Office.

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the total emissions of CO from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year and may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stacks serving the uncontrolled dynamometers and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly summaries that identify:
  - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
  - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer or alternative control device, or the monitoring equipment when the emissions unit(s) was/were in operation; and
  - c. any deviations (as defined in the operations manual) from the operating parameters of an alternative control device that were established during the most recent emissions test that demonstrated that the emissions unit was in compliance and approved by the Ohio EPA, Central District Office.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall submit deviation (excursion) reports that identify each day during which the emissions unit is operated to test anything other than engine driven transmissions. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

1. Compliance with the emission limitations specified in Section A.I.1 of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
2.7 lbs of CO/hr and 11.9 tons of CO/yr  
  
Applicable Compliance Method:

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 3940 lb CO/1000 gal of gasoline and a maximum gasoline usage of 23 gallons per hour (this emissions factor was derived from the USEPA's Factor Information Retrieval Data System (FIRE6.01) for criteria pollutants using SCC number 20400401 for reciprocating engines). The annual carbon monoxide emission limitation was established by multiplying the hourly emission rate (2.70 lbs/hr) by 8760 hours per year.

Controlled emissions shall be calculated as follows:

hourly emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} = 90.62 \text{ lbs of CO/hr}$

fugitive emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.99) = 0.91 \text{ lbs of CO/hr}$

stack emissions:  $90.62 \text{ lbs of CO/hr} \times (1-.98) = 1.8 \text{ lbs of CO/hr}$

annual emissions:  $3940 \text{ lb CO}/1000 \text{ gal} \times 23 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 396.92 \text{ tons per year}$

fugitive emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 3.97 \text{ ton of CO/yr}$

stack emissions:  $396.92 \text{ ton of CO/yr} \times (1-.98) = 7.93 \text{ ton of CO/yr}$

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 180 days of the issuance of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for CO. This limitation includes both fugitive and stack emissions (fugitive emissions are assumed to be 1% based on emissions testing conducted on similar emissions unit B027 on May 11-13, 2004).
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 10. Alternative ISAPI-approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the Submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

b. Emission Limitation:

0.310 lbs particulate/ mmBtu.

Applicable Compliance Method:

The emission limit of 0.310 lbs particulate/ mmBtu was determined using the emission factor from AP-42, 5<sup>th</sup> edition, Table 3.31 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines.

**VI. Miscellaneous Requirements**

None

**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 - (B038) - Building 14 - Transmission Dynamometer 4 controlled by a thermal incinerator or alternative control device.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None