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Facility Name: **Honda of America Mfg Inc**

Application Number: **01-6647**

Date: **Draft PTI (date will be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|-------------------------------|-------------------------------------|--------------------------|---|--|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Honda of America Mfg Inc** located in **Union** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|--|---|---|
| P305 | Paint effluent system, Line 1 | Compliance with applicable rules and permitted limits; compliance with the Toxics Policy | 3745-31-05 3745-21-07 (G) | 0.91 ton formaldehyde per year 0.91 ton formaldehyde per rolling 12-months |
| P306 | Paint effluent system, Line 2 | Compliance with applicable rules and permitted limits; compliance with the Toxics Policy | 3745-31-05 3745-21-07 (G) | 0.81 ton formaldehyde per year 0.81 ton formaldehyde per rolling 12-months |

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|---|---|------------------------------|---|--|
| | <u>Pollutant</u> | | <u>Tons/Year</u> | |
| | Formaldehyde | | 1.72 | |

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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A. Restrictions on Material Usage

1. The maximum usage of the flocculent/detackifier "Paint Kill 9511", or other chemically similar, approved flocculent/detackifier containing formaldehyde, shall not exceed 606,000 pounds per rolling 12-month period in Line 1's wastewater system and shall not exceed 540,000 pounds per rolling 12-month period in Line 2's wastewater system. The maximum rolling 12-month emissions of formaldehyde, calculated as 100 percent volatilized, from source P305 shall not exceed 0.91 ton, and from source P306 shall not exceed 0.81 ton. To ensure federal enforceability during the first 12 months of this permit, actual emissions from the previous 12 calendar months of operation shall be used to calculate the 12-month rolling emissions.

B. Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for each wastewater system:
 - a. the company identification for each material added to the wastewater for the purpose of paint overspray flocculation and removal;
 - b. the number of pounds of detackifying agent/flocculent added to these wastewater systems;
 - c. the formaldehyde content of each detackifying agent/flocculent, in percent by weight; and,
 - d. the total formaldehyde emission rate, calculated as 100 percent volatilized, for all detackifying agent/flocculent added to these sources, in pounds or tons per rolling 12-month period.
2. Each record of detackifying agent/flocculent addition, emission calculations, and support information required pursuant to this permit shall be retained for a period of five (5) 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

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monitoring instrumentation (if any), and copies of all reports and calculations required by the permit. Such records may be maintained in computerized form. These monthly records, as well as, any supporting analyses and computations, shall be made available to the Director or any authorized representative of the Director for review upon verbal or written request.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of any monthly record showing total formaldehyde emissions exceeding 0.91 ton per rolling 12-month period for source P305 and/or exceeding 0.81 ton per rolling 12-month period for source P306, and the emission rate for this period, calculated as 100 percent volatilized; and,
 - b. an identification of any monthly record showing an exceedance of the rolling 12-month usage limits for "Paint Kill 9511", or other approved flocculent/detackifier, of 606,000 pounds for Line 1's wastewater system and/or 540,000 pounds for Line 2's wastewater system.
2. The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs. If no exceedance(s) occurs, then no report shall be required.
3. The permittee shall also submit annual reports which specify the total formaldehyde emissions from these sources for the previous calendar year. These reports shall be submitted by February 15th of each year.
4. Prior notification to and approval from the Ohio EPA Central District Office is required, including the possible issuance of modifications to the permit to install and/or the operating permit, if any change in the composition of the paint flocculent/detackifying agent or the use of new flocculent/detackifying agents would result in increased formaldehyde emission or emissions of other toxic materials from these sources.

D. Compliance Testing Requirements

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1. Emission Limitation

P305 - 0.91 ton Formaldehyde/year

P306 - 0.81 ton Formaldehyde/year

Applicable Compliance Method

Compliance with this limit shall be determined through maintaining records of the name of materials added to the wastewater as a detactifying agent/flocculent, the amount of each material, and the formaldehyde content of each material. Formulation data from the coating manufacturer shall be used to determine the formaldehyde content of each detactifying agent/flocculent. Emissions shall be calculated by summing the formaldehyde content of each detactifying agent/flocculent used, each calculated as follows:

Maximum formaldehyde emissions=formaldehyde content of detactifying agent/flocculent (in percent by weight) X amount of detactifying agent/flocculent used per year (or rolling 12-month period) (in gallons) X density of detactifying agent/flocculent (in pounds/gallon).