



Environmental Protection Agency

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

4/20/2012

Certified Mail

Stephen Fogle  
Honda of America Mfg., Inc., Marysville Auto Plant  
Marysville Automobile Plant  
24000 Honda Parkway  
Marysville, OH 43040-9251

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0180010193  
Permit Number: P0108858  
Permit Type: OAC Chapter 3745-31 Modification  
County: Union

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-CDO





## Response to Comments

Facility ID:	0180010193
Facility Name:	Honda of America Mfg., Inc., Marysville Auto Plant
Facility Description:	Motor Vehicles and Car Bodies
Facility Address:	24000 Honda Parkway Marysville, OH 43040-9251 Union County
Permit:	P0108858, Permit-To-Install - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Marysville Tribune on 03/17/2012. The comment period ended on 04/16/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

**1. Topic: None**

- a. Comment: None
- b. Response: None





**FINAL**

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

for

Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID: 0180010193  
Permit Number: P0108858  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 4/20/2012  
Effective: 4/20/2012





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

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## Authorization

Facility ID: 0180010193  
Facility Description: Motor Vehicles and Car Bodies  
Application Number(s): A0042793  
Permit Number: P0108858  
Permit Description: Chapter 31 modification to change the current BAT limits for VOC from non-coating materials from 4.8 pounds per gallon excluding water and exempt solvents to 4.8 pounds per gallon including water and exempt solvents. Also, the facility requested to remove OAC rule 3745-17-11(B)(1) from the permit as a result of using only hand-held cup spray guns in final repair (K007) and to increase the PE limit from coating overspray for K007.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,000.00  
Issue Date: 4/20/2012  
Effective Date: 4/20/2012

This document constitutes issuance to:

Honda of America Mfg., Inc., Marysville Auto Plant  
24000 Honda Parkway  
Marysville, OH 43040-9251

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

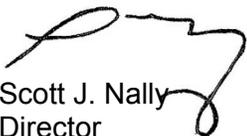
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108858

Permit Description: Chapter 31 modification to change the current BAT limits for VOC from non-coating materials from 4.8 pounds per gallon excluding water and exempt solvents to 4.8 pounds per gallon including water and exempt solvents. Also, the facility requested to remove OAC rule 3745-17-11(B)(1) from the permit as a result of using only hand-held cup spray guns in final repair (K007) and to increase the PE limit from coating overspray for K007.

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

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K007**

PA Final Repair Booths  
01-08341  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K239**

Paint Shop Polish Coating Lines 1 and 2  
P0106970  
Not Applicable



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

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

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

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

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

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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## 10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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



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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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

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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The permittee is subject to the rules of the Subpart IIII MACT standard (40 CFR Part 63, Subpart IIII) as an existing major source with a compliance date as specified in the final standard. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Central District Office.

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



1. K007, PA Final Repair Booths

Operations, Property and/or Equipment Description:

Final Repair, with 4 coating booths equipped with natural-gas fired air supply units and dry filtered exhaust, hand held cup spray coating applicators, coating applicators that do not generate coating overspray (i.e. hand held brushes), infrared drying equipment, dryers heated with natural gas, and buffing, polishing and sanding equipment.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(A)(1)(k)	OAC rule 3745-17-11 does not apply to surface coating processes that employ hand-held cup spray guns.
b.	OAC rule 3745-21-09(C)(1)(d)	Volatile organic compound (VOC) emissions from coatings shall not exceed 4.8 pounds per gallon (lbs/gal) of coating, excluding water and exempt solvents, as a daily volume weighted average.
c.	OAC rule 3745-31-05(A)(3)	PE from sanding and buffing shall not exceed 2.10 lbs per hour (lbs/hr) and there shall be no visible emissions from any facility opening in the vicinity of the sanding/buffing operations.  VOC emissions from non-coating materials (polish and other repair materials) shall not exceed 4.8 lbs/gal of material, including water and exempt solvents.  Emissions from the combustion of natural gas in the air supply unit(s) shall not exceed the following:  0.04 lb PE/hr (filterable) 0.17 ton PE per year (ton/yr) (filterable)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.01 lb sulfur dioxide (SO<sub>2</sub>)/hr 0.05 ton SO<sub>2</sub>/yr 2.01 lbs nitrogen oxide (NO<sub>x</sub>)/hr 8.81 tons NO<sub>x</sub>/yr 1.69 lbs carbon monoxide (CO)/hr 7.40 tons CO/yr 0.11 lb VOC/hr 0.48 ton VOC/yr from burners.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1) and 3745-31-05(D).</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)a. below.
e.	OAC rule 3745-31-05(D)	<p>PE from coating overspray shall not exceed 0.90 ton per rolling 12-months.</p> <p>PE from sanding and buffing shall not exceed 2.10 tons per rolling 12-months.</p> <p>VOC emissions from coatings and organic compound from non-coating materials (polish and other repair materials) excluding cleanup and purge materials, shall not exceed 6.0 tons per rolling 12-months. Emissions from cleanup and purge materials are accounted for in PTI P0106970.</p> <p>Total coating and non-coating materials (polish and other repair materials) usage, excluding cleanup and purge materials, shall not exceed 2,400 gallons per rolling 12-months.</p> <p>See Section b)(2)b.</p>
f.	40 CFR Part 63, Subpart IIII	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall</p>



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: Empty, Empty. Row 2: Empty, comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO2, NOx, and CO emissions from this emissions unit because annual emissions of each pollutant are less than ten tons per years. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) also do not apply to the VOC emissions from this emissions unit because annual VOC emissions are less than ten tons per year taking into account the two federally enforceable limitations, established under OAC rule 3745-31-05(D) totaling 6.0 tons of VOC per rolling, 12-month period.

b. The record keeping for the cleanup and purge materials applied in Final Repair, K007, and the emissions from these materials are accounted for and covered in PTI P0106970. PTI P0106970 contains a "group limit" for the automobile Lines 1 and 2 and the cleanup materials from the associated emission units, including K007.

c. In order to test the spray applicators effect, coatings being tested in the Automotive Test Facility (ATF) and the Materials Test Lab (MTL) labs may be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of ATF and MTL test coatings in Final Repair as part of the emissions calculated for emissions units K011 (ATF) and R016 (MTL).

c) Operational Restrictions

(1) The permittee shall operate the fabric filter system within the booths whenever this emissions unit is in operation using a spray coating application. This restriction does not apply to the use of air-dry lacquer coatings applied in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for coatings used in the final repair operations:

- a. the name and identification number of each coating, as applied;
b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
  - (2) The permittee shall collect and record the following information each month for non-coating materials (polishes and other repair materials) used in the final repair operations:
    - a. the name and identification number of each non-coating material, as applied; and
    - b. the VOC content of each non-coating material, as applied.
  - (3) The permittee shall collect and record the following information each month for the purpose of determining 12-month rolling emissions and material usage from the emissions unit:

(Note: the 12-month rolling emissions from cleanup and purge materials are accounted for in PTI P0106970)

    - a. the name and identification of each coating and non-coating material (polish and other repair material) employed;
    - b. the VOC content of each coating and each non-coating material (polish and other repair material) employed, in pounds per gallon;
    - c. the number of gallons of each coating and non-coating material (polish and other repair materials) employed;
    - d. the total VOC emissions from all coatings and non-coating materials (polish and other repair materials) employed;
    - e. the rolling 12-month total usage of coatings and non-coating materials (polish and other repair materials) employed in this emissions unit (gallons); and
    - f. the rolling 12-month total VOC emissions from coatings and non-coating materials (polish and other repair materials) employed in this emissions unit.
  - (4) The permittee shall maintain records that document any time periods when the emissions unit did not meet the requirements of Section c)(1).
  - (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- e) Reporting Requirements
  - (1) The permittee shall notify the Ohio EPA Central District Office (CDO) in writing of any daily record showing that the daily volume-weighted average VOC content of coatings exceeded 4.8 lbs/gal of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA CDO within 45 days after the exceedence occurs.

- (2) The permittee shall notify the Ohio EPA Central District Office (CDO) in writing of any monthly record showing that the use of noncomplying non-coating materials (polish and other repair materials) exceeding 4.8 lbs/gal of coating, including water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA CDO within 30 days following the end of the calendar quarter in which the exceedence occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedence of the 6.0 tons per rolling 12-month VOC limit from coatings and non-coating materials (polish and other repair materials);
  - b. any exceedence of the coating and non-coating material usage limit of 2,400 gallons per rolling 12-months; and
  - c. any calculated exceedence of the limit for PE from sanding operations.

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

- (4) The permittee shall notify the Ohio EPA CDO in writing of any record showing that the fabric filter system was not in service when the emissions unit was in operation using a spray coating application. The notification shall include a copy of such record and shall be sent to the Ohio EPA CDO within 30 days following the end of the calendar quarter in which the exceedence occurs. This requirement does not apply to the use of air-dry lacquer coatings applied in this emissions unit.
  - (5) The permittee shall submit annual reports which specify the total emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report. PE less than 1 ton per year need not be reported.
  - (6) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation  
4.8 lbs VOC/gal of coating, excluding water and exempt solvents, as a daily volume weighted average



Applicable Compliance Method

Compliance with the coating VOC limit shall be determined through daily recordkeeping of the organic compound content of each coating and material used less water and exempt solvents. Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials. The daily volume-weighted average VOC content of all materials, as applied, shall be calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

b. Emission Limitation

4.8 lbs VOC/gal of non-coating material, including water and exempt solvents,

Applicable Compliance Method

Compliance with the non-coating material (polish and other repair materials) VOC content limit shall be determined through monthly recordkeeping of the organic compound content of each non-coating material used. Formulation data from each material's manufacturer or US EPA Method 24 shall be used to determine the volatile organic compound content of the materials.

c. Emission Limitation

0.90 ton PE/ per rolling 12-month period from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the fabric filter control equipment found in Sections c)(1), d)(4), and e)(4) of this permit and meeting the limit of 2,400 gallons of coatings and non-coatings per rolling 12 months.

d. Emission Limitation

2.10 lbs PE/hr and 2.10 tons PE/rolling 12-month period from sanding and buffing

Applicable Compliance Method

Compliance with this limit has been determined through the application of the following engineering calculations of potential emissions:

Units/yr	Area sanded (ft <sup>2</sup> ) per unit	Sanding depth (ft)	PE density (lb/ft <sup>3</sup> )	Uncontrolled PE (lbs/yr)
90,000	16.36	1.64 x 10 <sup>-5</sup>	68.68	1659
90,000	1.5	9.84 x 10 <sup>-5</sup>	68.68	913



90,000	1.5	$9.84 \times 10^{-5}$	106.15	1410
10,000	1.0	$9.84 \times 10^{-5}$	99.9	98
50	16.36	$5.577 \times 10^{-4}$	106.15	48

Total Emissions: = 4,128 lbs PE/yr  
= 2.06 tons PE/yr

@ 2000 hours of operation/yr = 2.06 lbs PE/hr

Since these calculations represent the worst-case and the potential emissions from sanding, no other demonstration of compliance is required.

e. Emission Limitation

No visible emissions from any facility opening in the vicinity of the sanding/buffing operations

Applicable Compliance Method

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

f. Emissions Limitation

6.0 tons VOC/rolling 12-months from coatings and non-coating materials

Applicable Compliance Method

Compliance with the rolling 12-month emissions limit shall be determined through monthly recordkeeping of coating and non-coating material (polish and other repair materials) usage, and the VOC/OC content of each material. Formulation data from the manufacturers or US EPA Method 24 shall be used to determine the VOC content of the coatings and the OC content of the non-coating materials to be used in the calculation of emissions. Twelve month rolling emissions shall be calculated by adding the current monthly emissions calculations to the previous 11 month's emission calculations.

g. Emissions Limitation

Emissions from the combustion of natural gas in the air supply unit(s) shall not exceed the following:

- 0.04 lb PE/hr
- 0.17 ton PE/yr
- 0.01 lb SO<sub>2</sub>/hr

0.05 ton SO<sub>2</sub>/yr  
2.01 lbsNO<sub>x</sub>/hr  
8.81 tons NO<sub>x</sub>/yr  
1.69 lbs CO/hr  
7.40 tons CO/yr  
0.11 lb VOC/hr  
0.48 ton VOC/yr  
from burners

Applicable Compliance Method

These limits represent the maximum capacity of the air supply unit burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (20,120 ft<sup>3</sup>/hr) by the emission factors for each pollutant (lbs of pollutant/MMft<sup>3</sup>) found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1 and 1.4-2. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton to obtain the potential emissions of the burners. Since these limits reflect potential emissions of the burners, no additional compliance determination is required.

g) Miscellaneous Requirements

(1) None.



2. K239, Paint Shop Polish Coating Lines 1 and 2

Operations, Property and/or Equipment Description:

Body Paint Line 1 and Line 2 Polish Operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the polish operations shall not exceed 4.8 lbs/gallon, including water and exempt solvents.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(D)	<p>VOC emissions from the polish operations shall not exceed 2.1 tons per rolling 12-month period.</p> <p>See Sections b)(2)c. and c)(1).</p>

(2) Additional Terms and Conditions

a. The polish operation consists of polish application in the repair line, main line, and topcoat inspection areas in the Body Paint Line 1 and Line 2 coating lines. VOC emissions from the polish operations are not controlled.

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

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit because annual VOC emissions are less than ten tons

per year taking into account the federally enforceable limitation established under OAC rule 3745-31-05(D) which limits VOC emissions to 2.1 tons of VOC per rolling, 12-month period.

- c. VOC emissions from vehicle production for Line 2 emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- d. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in permit P0106970 under emissions units K201, K206, K208, R003, R102, and R103.

c) Operational Restrictions

- (1) The maximum polish material usage for this emissions unit shall not cause emissions to exceed 2.1 tons of VOC per rolling, 12-month period, calculated using the following formula:

2.1 tons VOC =  $\sum (P_i) \times (\text{VOC}_i) / 2000$ ; where

$P_i$  = usage of polishing materials,  $i$ , in gallons or pounds (percent mass by weight of solvent contained within a gallon of polishing material)

$\text{VOC}_i$  = VOC of polishing materials,  $i$ , in pounds per gallon or percent by weight (assumes 100% of organic solvent is emitted)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for this emissions unit:
  - a. the name and identification of each polish material;
  - b. the VOC content of each polish material, in pounds per gallon or percent by weight, including water and exempt solvent
  - c. the number of gallons or pounds of each polish material employed;
  - d. the calculated total VOC emissions from all polish materials employed, in pounds per month;
  - e. the rolling, 12-month VOC emissions from polish materials employed, in pounds or tons; and
  - f. documentation on whether or not each polish material employed in this emissions unit is photochemically reactive.
- (2) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K235-K239 and P341:

- a. The total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the Line 2 emissions units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
  - b. The total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the Line 2 emissions units combined, in tons VOC per rolling 12-month period.
- (3) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. all monthly records showing a calculated VOC emissions exceedance of the Line 2 emission limitation of 515.7 tons per rolling 12-month period;
    - b. all monthly records showing a calculated VOC emissions exceedance of the K239 emission limitation of 2.1 tons per rolling 12-month period; and
    - c. records showing the use of a polish material that exceeds 4.8 lbs VOC/gallon, including water and exempt solvents.
- These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitations:  
4.8lbs VOC/gallon, including water and exempt solvent

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above.

b. Emission Limitation:

2.1 tons VOC per rolling 12-month period from polish operations.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(1) above.

c. Emission Limitations:

515.7 tons VOC per rolling 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section d)(2) above.

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.