



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

1/24/2013

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0180010193
Permit Number: P0111481
Permit Type: Initial Installation
County: Union

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Marysville Tribune. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: On October 11, 2012, Honda of America Mfg., Inc. – Marysville Auto Plant (Honda) submitted an application for two changes to Assembly Line 1. The first is the initial installation of a new emissions unit, Line 1 MVH Foam Application (P349), which will be used to inject sound deadening foam into the frames of automobiles and light duty trucks. The process involves a two-part (prepolymer and curative) polyurethane foam that is injected using robotic application equipment, although manual application may also be an option. In addition to this new installation, Honda is also modifying the existing Line 1 topcoat coating operation (K208) to increase the amount of coating applied per unit (vehicle). Eight additional application robots are being installed to meet paint quality requirements. Because no allowable emission limits for K208 will be exceeded, no PTI modification for K208 is necessary. The modification to K208 is, however, considered a part of a New Source Review (NSR) project along with the installation of P349, and a netting analysis to show no significant emissions increase has been submitted along with this application.
3. Facility Emissions and Attainment Status: The facility is classified as Title V due to emissions of volatile organic compounds (VOC) over the Title V threshold of 100 tons per year. The facility is also considered major for NSR purposes due to emissions of VOCs over the NSR (PSD) major stationary source threshold of 250 tons per year. Union County is currently in attainment for all criteria pollutants.
4. Source Emissions:

Netting

A netting analysis was submitted for VOC, PE, PM₁₀, and PM_{2.5} to show that no significant emissions increase has occurred as a result of the modification of K208 and the initial installation of P349. As explained in the application, "Because the project involves a new emissions unit and an existing emissions unit, Honda used the hybrid method as defined in OAC 3745-31-01(JJJ)(4)(c) for determining project emissions." In terms of VOC emissions, the application sets the projected VOC emission rate for the MVH foam process at the requested permit limit of 4.0 tons per rolling-12 month period. The projected VOC emission rate for K208 is based on the current allowable production of 245,000 units per year of production and the projected pounds of emissions per unit (PPU). The projected PPU (3.55 lbs VOC /unit) is the sum of the largest annual PPU calculated from the baseline year data (3.42 lbs VOC/unit from Table 2) and the projected increase in emissions per unit (0.13 lbs VOC/unit) from the additional coating that will be applied by the new applicators. Excluded emissions for K208 from the baseline period are taken into account because the emissions unit was capable both physically and legally during the baseline period to produce up to 245,000 units per year and achieved the pound per unit emissions rate used for determining the exclusions.¹ The significant emissions increase in VOC emissions was determined by the following:

K208

Baseline average emissions: 369.10 tons/yr based on *average* throughput of 218,713 units
PPU from baseline: 3.42 lbs VOC/unit based on *actual* throughput of 221,221 units
Capacity during baseline period (and present): 245,000 units/yr



Emissions during baseline if operated at capacity: 245,000 units/yr x 3.42 lbs VOC/unit x 1 ton/2000 lbs = 419 tons/yr
Emissions to be excluded¹: 419 tonsVOC/yr – 369.1 tonsVOC/yr = 49.9 tonsVOC/yr

¹Could have been accommodated during baseline period (see OAC rule 3745-31-01(AAAAA)(1)(c))

Projected actual emissions from K208:

Emissions from modified unit² - baseline average emissions - excluded emissions = emissions increase
²(production limit x projected PPU)

[(245,000 units/yr x 3.55 lbs VOC/unit) x 1 ton/2000 lbs] tons VOC /yr - 369.10 tons VOC/yr – 49.90 tons VOC/yr = 15.90 tons VOC /yr

P349

Prepolymer: 34211 gallons x 0.1 lb VOC/gal x 1 ton/2000 lbs = 1.71 tons VOC/yr

Curative: 1500 gallons x 3.0 lb VOC/gal x 1 ton/2000 lbs = 2.25 tons VOC/yr

Total Foam: 1.71 tonsVOC /yr + 2.25 tonsVOC /yr = 3.96 tons/yr ~ 4.0 tons VOC/yr

Projected emissions: Set at PTE or enforceable permit limit (as is this case) for new source = 4.0 tonsVOC/yr

Total Project Projected Emissions Increase = Emissions from K208 + Emissions from P349

15.90 tons/yr + 4.0 tons/yr = 19.9 tons/yr

PSD significance level for VOC = 40 tons/yr

19.9 tons < 40 tons/yr; therefore, no significant emissions increase has occurred.

The same methodology was used to demonstrate that the projected increase in emissions of PE, PM₁₀ and PM_{2.5} were each below the respective pollutant significance levels with resulting PE and PM₁₀ emissions determined to be 0.4 tons/yr and PM_{2.5} determined to be 0.2 tons/yr. Note: Only K208 contributed emissions of particulate to this analysis as no particulate emissions are emitted from P349.

Permit Issues

To reiterate, because no allowable emission limits for existing emissions unit K208 will be exceeded, no PTI modification for K208 is necessary.

For P349, according to the application, no other pollutants, besides VOC and HAPs, are emitted from the emissions source.

In terms of this PTI for P349, the allowable VOC emission limit for P349 is 4.0 tons per rolling 12 month period and will be cited as a federally enforceable permit limitation under OAC rule 3745-31-05(D), as requested by the permittee, to avoid triggering a major modification under New Source Review. Appropriate monitoring and recordkeeping is included in the permit to ensure compliance with this limitation.

Emission source P349 is subject to 40 CFR 63, Subpart IIII “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks”. Applicable requirements have been incorporated by reference into the permit.

BAT for P349 includes a short term limitation that is equivalent to OAC rule 3745-21-09(U)(1) for miscellaneous coatings which states that VOC emissions shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents. Because emissions, due to a federally enforceable condition, are less than 10 tons per year (4.0 tons per rolling 12-month period under OAC rule 3745-31-05(D)), the permit also includes the “sunsetting” provision that states that once US EPA approves the December 1, 2006 version



of OAC rule 3745-31-05 as part of the State Implementation Plan, the BAT requirements included under OAC rule 3745-31-05(A)(3) in the permit no longer apply.

5. Total Permit Allowable Emissions Summary:

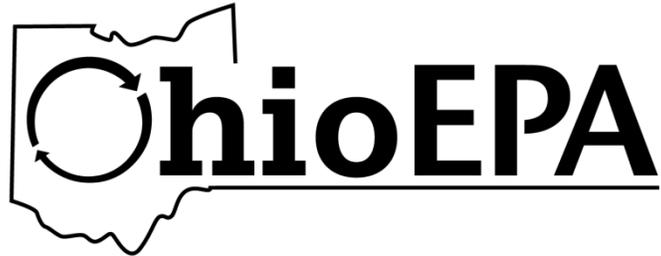
<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.0
HAPs	1.71

6. Conclusion: The issuance of Permit No. P0111481 is recommended.

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Honda of America Mfg., Inc., Marysville Auto Plant

Issue Date: 1/24/2013
Permit Number: P0111481
Permit Type: Initial Installation
Permit Description: Initial installation of a foam application operation.
Facility ID: 0180010193
Facility Location: Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway,
Marysville, OH 43040-9251
Facility Description: Automobile Manufacturing, Light Truck and Utility Vehicle Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kelly Saavedra, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

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

for

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

Facility ID:	0180010193
Permit Number:	P0111481
Permit Type:	Initial Installation
Issued:	1/24/2013
Effective:	To be entered upon final issuance



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

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Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0180010193
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): A0044800
Permit Number: P0111481
Permit Description: Initial installation of a foam application operation.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/24/2013
Effective Date: To be entered upon final issuance

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 Environmental Protection Agency (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



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0111481
Permit Description: Initial installation of a foam application operation.

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

Emissions Unit ID:	P349
Company Equipment ID:	Line 1 MVH Foam Application
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

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.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

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. For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a) None.

3. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: P349. 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 appropriate Ohio EPA District office or local air agency.



Draft Permit-to-Install
Honda of America Mfg., Inc., Marysville Auto Plant
Permit Number: P0111481
Facility ID: 0180010193
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P349, Line 1 MVH Foam Application

Operations, Property and/or Equipment Description:

Application of polyurethane foam in vehicle cavities for sound deadening using robotic and/or manual applicators

- 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 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 3.0 pounds per gallon (lbs/gal), excluding water and exempt solvent materials. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions shall not exceed 3.0 lbs/gal, excluding water and exempt solvent materials. The requirements established pursuant to this rule also include compliance with OAC rules 3745-21-09(U)(1)(i) and 3745-31-05(D). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid NSR)	VOC emissions shall not exceed 4.0 tons per rolling 12-month period. See c)(1).
e.	40 CFR Part 63, Subpart IIII	See b)(2)c.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)d.



(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)b.
- 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons per year taking into account the federally enforceable production limit under 3745-31-05(D).

- c. The emissions limitation that applies to this emissions unit is identified in 40 CFR Part 63.3091 and is determined to be the following:

Average organic HAP emissions from all deadener materials used in the affected source are limited to no more than 0.010 lb/lb of deadener material used during each month.
- d. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) The maximum 12-month rolling material usage rate of each type of coating used shall be such that the resulting VOC emissions do not exceed 4.0 tons per rolling 12-month period as represented by the following equation:

$$\sum_{i=1}^n \frac{(U_i)(VOC_i)}{2000 \frac{lb}{ton}} \leq 4.0 \text{ tons per rolling 12 - month period}$$

U_i = volume of material i in gallons

VOC_i = VOC content of material i in lb/gal



- (2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each month:
 - a. the name and identification of each coating material applied;
 - b. the VOC content of each coating material applied;
 - c. the number of gallons of each coating material employed;
 - d. the total VOC emissions from all coating materials employed, in pounds or tons, i.e., the summation of the products of the amounts (c) of all coatings applied in this emissions unit times each material's VOC content (b);and
 - e. the rolling, 12-month total VOC emissions, i.e., (d) + the calculated total VOC emissions for the previous 11 months.
 - (2) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- e) **Reporting Requirements**
- (1) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lbs VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the rolling 12-month VOC emissions limitation specified in b)(1)d. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (3) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.
 - (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.



- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
 - (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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. Emissions Limitation:

The VOC content of each coating shall not exceed 3.0 lbs/gal, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limit may be determined through monthly recordkeeping specified in Section (d)(1) above. Formulation data from the manufacturer of the coating or US EPA Method 24 shall be used to determine the VOC content.
 - b. Emissions Limitation:

VOC emissions shall not exceed 4.0 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping requirements in Section d)(1).
 - (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.
 - (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.