



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
LOGAN COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov. Center  
P.O. Box 1049

**Application No: 05-10278**

**Fac ID: 0546000117**

**DATE: 10/4/2007**

Honda of America East Liberty Plant  
Jeff Waid  
11000 State Rte 347  
East Liberty, OH 43319

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Sincerely,

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

CC: USEPA

SWDO



Permit To Install  
Terms and Conditions

Issue Date: 10/4/2007  
Effective Date: 10/4/2007

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 05-10278**

Application Number: 05-10278  
Facility ID: 0546000117  
Permit Fee: **\$500**  
Name of Facility: Honda of America East Liberty Plant  
Person to Contact: Jeff Waid  
Address: 11000 State Rte 347  
East Liberty, OH 43319

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11000 State Rte 347**  
**East Liberty, Ohio**

Description of proposed emissions unit(s):  
**The permittee has requested the ability to remove the incinerator from emissions unit K015, will maintaining the current 12-month rolling VOC emission limitations.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

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

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

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

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

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

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

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

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

## **3. Risk Management Plans**

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

#### **4. Title IV Provisions**

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

#### **5. Severability Clause**

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

#### **6. General Requirements**

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

**7. Fees**

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

**8. Federal and State Enforceability**

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

**9. Compliance Requirements**

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

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

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

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

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

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

**12. Air Pollution Nuisance**

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

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

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

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

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**Honda of America East Liberty Plant**  
**PTI Application: 05-10278**  
**Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

**4. Authorization To Install or Modify**

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

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

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

**6. Public Disclosure**

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

**7. Applicability**

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

**8. Construction Compliance Certification**

**Honda of America East Liberty Plant  
 PTI Application: 05-10278  
 Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	201.59 + 2.95 (oven)
PM	8.64 + 2.04 (oven)
CO	22.51 (oven)
NOx	26.80 (oven)
SO2	0.16 (oven)

**Honda of America East Liberty Plant  
PTI Application: 05-10278  
Modification Issued: 10/4/2007**

**Facility ID: 0546000117**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.	OAC rule 3745-31-05(A)  40 CFR Part 63, Subpart PPPP
Modified	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-10
	OAC rule 3745-17-11
	OAC rule 3745-31-05(C)

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PTI A

Modification Issued: 10/4/2007

Emissions Unit ID: K015

Applicable Emissions  
Limitations/Control  
Measures

3512 lbs VOC/day  
172 lbs PM/day

Oven Emissions:  
0.47 lb PM/hr, 2.04 TPY  
PM,  
0.04 lb SO<sub>2</sub>/hr, 0.16 TPY  
SO<sub>2</sub>,  
6.12 lbs NO<sub>x</sub>/hr, 26.8  
TPY NO<sub>x</sub>,  
5.14 lbs CO/hr, 22.51  
TPY CO,  
0.67 lb TOC/hr, 2.95 TPY  
TOC

See A.2.a. below.

The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

7.46 lb PM/hr

See terms A.II.1., 2., 3.

188 tons VOC per rolling, 12-month summation of the monthly emissions.

8.64 tons of PM per rolling 12-month summation of the emissions.

HAP emissions shall not exceed 0.26 lb organic HAP emitted per lb coating solids used during each 12-month compliance period.

Modification Issued: 10/4/2007

**2. Additional Terms and Conditions**

- 2.a** The pound per day limitations for VOC and PM are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.

**II. Operational Restrictions**

1. The maximum material usage for this emissions unit shall not cause VOC emissions to exceed 188 tons per rolling 12-month period, calculated according to the following formula:

$$\text{AER} = \{[(C1 \times \text{OCc}1) + (C2 \times \text{OCc}2) + \text{etc...}] + [(S1 \times \text{OCs}1) + (S2 \times \text{OCs}2) + \text{etc...}]\} / 2000 \text{ lbs/ton} - \text{R} / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

S = usage of purge and cleanup solvent j, in gallons;

OCc = organic compound content of the coatings, in pounds per gallon;

OCs = organic compound content of the solvents, in pounds per gallon;

R = amount of OC recovered in the purge system, in pounds; and

1,2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

2. The maximum material usage for this emissions unit shall not cause PM emissions to exceed 8.64 tons per rolling 12-month period, calculated according to the following formula:

$$\text{AER} = \{[(C1 \times D1 \times \text{S}\%1) + (C2 \times D2 \times \text{S}\%2) + \text{etc...}] \times (1-\text{TE})\} \times (1-\text{RE}) / 2000 \text{ lbs/ton}$$

where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

D = density of coating, in pounds per gallons;

S% = non-volatile percentage (solids) of coating i, in percent by weight;

TE = transfer efficiency of the coating onto the substrate (%);

RE = particulate removal efficiency of the underbooth waterwash system (%); and

1,2, etc.. = individual coating, density, and specific OC content for each coating.

**Hond****PTI A****Modification Issued: 10/4/2007**Emissions Unit ID: **K015**

3. HAP emissions shall not exceed 0.26 lb organic HAP emitted per lb coating solids used during each 12-month compliance period.
4. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual particulate matter emissions, based upon a 12-month summation of the monthly emissions:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the density of each coating, in pounds per gallon;
  - d. the non-volatile percentage (solids) of each coating, in percent by weight; and
  - e. the rolling, 12-month summation of the total PM emissions, according to the formula in A.II.3.
2. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the volatile organic compound content of each coating and cleanup material, in pounds per gallon; and
  - d. the rolling, 12-month summation of the total controlled VOC emissions, according to the formula in A.II.2.
3. The permittee shall maintain the following monthly records on the hazardous air pollutant (HAP) emissions from the coatings employed in this emissions:
  - a. the name and identification number of each above coating employed;
  - b. amount of each coating employed, in gallons per month;
  - c. the density of each coating employed, in lbs per gallon;
  - d. the HAP content for each coating employed, in lbs of HAP(s) per gallon;
  - e. the solids content for each coating employed, in percent (%) by weight of coating;

Emissions Unit ID: **K015**

- f. the HAP emission rate for each coating, in lbs per month, (the summation of ("b" x "d"));
- g. the total combined HAP(s) emissions from this emissions unit, in lbs per month (the summation of "f" from all the coatings employed);
- h. the amount of solid employed for each coating, in lbs per month, (the summation of ("b" x "c" x "e"));
- i. the total combined solids employed from this emissions unit, in lbs per month, (the summation of "h" from all the coatings employed); and
- j. the rolling, 12-month total combined HAP(s) emitted from this emissions unit, lbs of HAP(s) emitted per lbs of solids employed, (the summation of : [(the lbs of HAP(s) emitted, for the current month ("g") plus the lbs of HAP(s) emitted, for the 11 previous calendar months) / (the lbs of solids employed, for the current month ("i") plus the lbs of solids employed, for the 11 previous calendar months)]).

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC emissions exceed 188 tons per rolling 12-month period;
  - b. the particulate emissions exceed 8.64 tons per rolling 12-month period; and
  - c. the HAP(s) emissions exceed 0.26 lbs of HAP per lbs of coating solids employed, as based on a rolling 12-month volume-weighted average of all coatings employed in this emissions unit.
2. The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:
 

188 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in

**Hond**

**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: **K015**

section A.III.2.d. of this  
permit.

b. Emission Limitation:

Emissions of PM from this emission unit shall not exceed 8.64 tons per rolling 12-month period.

**Hond**  
**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: **K015**

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section A.III. 1.e of this permit.

c . Emission Limitation:

7.46 lbs PM/hr - Overspray

Applicable Compliance Method:

Compliance with the hourly over-spray particulate emission limitation shall be determined using the following equation:

$$HER = [Mcu \times Hsc \times (1-Te)] \times (1- Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

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

d. Emission Limitation:

0.47 lb PM/hr, 2.04 TPY PM,  
0.04 lb SO<sub>2</sub>/hr, 0.16 TPY SO<sub>2</sub>,  
6.12 lbs NO<sub>x</sub>/hr, 26.8 TPY NO<sub>x</sub>,  
5.14 lbs CO/hr, 22.51 TPY CO,  
0.67 lb TOC/hr, 2.95 TPY TOC

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying

**Honda of America East Liberty Plant**  
**PTI Application: 05 10270**  
**Modif**

**Facility ID: 0546000117**

Emissions Unit ID: **K015**

the maximum natural gas usage rate (61,200 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission Limitation:

0.26 lbs of HAP per lbs of coating solids employed, as based on a rolling 12-month volume-weighted average of all coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section A.III.3.j. of this permit.

**VI. Miscellaneous Requirements**

None.

**Hond**  
**PTI A**

Emissions Unit ID: **K015**

**Modification Issued: 10/4/2007**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.	OAC rule 3745-114-01	Ohio Toxic Policy

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit K015 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the

**Hond:****PTI A****Modification Issued: 10/4/2007**Emissions Unit ID: **K015**

application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other

**Honda of America East Liberty Plant**  
**PTI Application: 05 10270**  
**Modif**

**Facility ID: 0546000117**

**Emissions Unit ID: K015**

provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

None.

#### **V. Testing Requirements**

None.

#### **VI. Miscellaneous Requirements**

None.

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PTI A

Modification Issued: 10/4/2007

Emissions Unit ID: P020

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Plastic parts polish and repair	OAC rule 3745-31-05(A)(3)	Emissions of Volatile organic Compounds (VOC) shall not exceed 32.88 lbs VOC/day, 0.74 TPY VOC
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.  The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	OAC rule 3745-31-05© )	See term A.II.1.  0.74 tons VOC per rolling, 12-month summation of the monthly emissions

**2. Additional Terms and Conditions**

- 2.a The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

**II. Operational Restrictions**

1. The maximum material usage for this emissions unit shall not cause emissions of VOC

Emissions Unit ID: P020

to exceed 0.74 ton per rolling 12-month period, calculated according to the following formula:

$$0.74 \text{ ton VOC} \geq \sum_{n=1}^i [(M_i)(OC_i)] \div 2000$$

where:

$M_i$  = usage of cleanup or touch-up coating material  $i$ , in gallons

$OC_i$  = the organic compound content of material  $i$ , in pounds per gallon

2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The rolling, 12-month summation of the total VOC emissions, calculated according to the formula in A.II.1.
2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in §63.4530 of that subpart in the manner detailed in §63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-monthly emission limitation for VOC.

This report is due by the date described in Part I-General Terms and Conditions of this permit under section (A)(1).

**Hond**

**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: P020

2. As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in §§63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

Hond

PTI A

Modification Issued: 10/4/2007

Emissions Unit ID: P020

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.74 ton per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term A.III.1.

2. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP §63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in §63.4540 through §63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

**VI. Miscellaneous Requirements**

None.

Hond  
PTI A

Emissions Unit ID: P020

Modification Issued: 10/4/2007

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Plastic parts polish and repair		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

1. The permit to install for this emissions unit P020 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

**Honda of America East Liberty Plant**  
**PTI Application: 05 10270**  
**Modif**

**Facility ID: 0546000117**

Emissions Unit ID: P020

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 821.0

MAGLC (ug/m3): 2286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

**Honda of America East Liberty Plant**

**PTI Application: 05 10270**

**Modif**

**Facility ID: 0546000117**

Emissions Unit ID: P020

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

None.

32

**Honda**

**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: P020

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

Honda

PTI A

Modification Issued: 10/4/2007

Emissions Unit ID: P021

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Miscellaneous solvents on plastic parts	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds shall not exceed 970.8 lbs VOC/day.  See A.2.a. below.
	OAC rule 3745-21-07(G)(2)	The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
	OAC rule 3745-31-05© )	See term A.II.1  12.85 tons VOC per rolling, 12-month summation of the monthly emissions

**2. Additional Terms and Conditions**

- 2.a The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.

**II. Operational Restrictions**

1. The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed 12.85 tons per rolling 12-month period, calculated according to the following formula:

$$12.85 \text{ tons VOC} \geq \sum_{i=1}^n [(S_i)(OC_i)] \div 2000$$

where:

$S_i$  = usage of solvent material  $i$ , in gallons

$OC_i$  = the organic compound content of material  $i$ , in pounds per gallon

2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
  - a. The company identification for each coating and cleanup material employed.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
  - d. The rolling, 12-monthly summation of the total VOC emissions, according to the formula in A.II.1.
2. As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in §63.4530 of that subpart in the manner detailed in §63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

**Hond**

**PTI A**

Emissions Unit ID: P021

**Modification Issued: 10/4/2007**

This report is due by the date described in Part I-General Terms and Conditions of this permit under section (A)(1).

2. As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in §§63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

**Hond****PTI A****Modification Issued: 10/4/2007**

Emissions Unit ID: P021

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

12.85 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term A.III.

2. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP §63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in §63.4540 through §63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

**VI. Miscellaneous Requirements**

None.

Honda of America East Liberty Plant  
 PTI Application: 05-10270  
 Modif

Facility ID: 0546000117

Emissions Unit ID: P021

## B. State Only Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Miscellaneous solvents on plastic parts		

### 2. Additional Terms and Conditions

- 2.a None.

### II. Operational Restrictions

1. The permit to install for this emissions unit P021 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Amyl Ketone

TLV (ug/m3): 233,000

Maximum Hourly Emission Rate (lbs/hr): 40.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.133

MAGLC (ug/m3): 5547.62

38

**Honda**

**PTI A**

**Modification Issued: 10/4/2007**

Emissions Unit ID: P021

**Modification Issued: 10/4/2007**

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

**Honda of America East Liberty Plant**  
**PTI Application: 05 10270**  
**Modif**

**Facility ID: 0546000117**

Emissions Unit ID: P021

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.