



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SHELBY COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 05-12918

Fac ID: 0575000174

DATE: 1/25/2005

Honda of America Mfg Inc
Paul Huwer
12500 MERANDA RD
ANNA, OH 453029699

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

SWDO

IN



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 05-12918

Application Number: 05-12918
Facility ID: 0575000174
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg Inc
Person to Contact: Paul Huwer
Address: 12500 MERANDA RD
ANNA, OH 453029699

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12500 Meranda Rd
Anna, Ohio**

Description of proposed emissions unit(s):
Two (2) natural gas fired boilers rated at 11.9 mmBtu/hr each.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Honda of America Mfg Inc

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Part I - GENERAL TERMS AND CONDITIONS

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

1. 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:
 - 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 record keeping 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 record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., 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.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

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 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, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

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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 To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 record keeping 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 record keeping 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install 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

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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)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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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., 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>
PE	0.45
NOx	23.8
CO	19.99
SO2	0.14
VOC	1.31

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. Pursuant to Ohio Administrative Code (OAC) rule 3745-31-05(C), the emissions from natural gas combustion for emissions units B050 and B051, and all the air contaminant sources that comprise the heating and ventilation system, inclusive, for this facility shall not exceed the following limitations:
 - a. Particulate emissions (PE) shall not exceed 0.45 ton per rolling, 12-month summation;
 - b. Nitrogen oxide (NO_x) emissions shall not exceed 23.8 tons per rolling, 12-month summation;
 - c. Carbon monoxide (CO) emissions shall not exceed 19.99 tons per rolling, 12-month summation;
 - d. Sulfur dioxide (SO₂) emissions shall not exceed 0.14 tons per rolling, 12-month summation; and
 - e. Volatile organic compound (VOC) emissions shall not exceed 1.31 tons per rolling, 12-month summation.
2. The natural gas fuel usage for emissions units B050 and B051, and all the air contaminant sources that comprise the heating and ventilation system, inclusive, for this facility shall not exceed 476 million standard cubic feet per rolling, 12-month summation of the natural gas usage records.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit. Therefore, it is not necessary to establish natural gas usage limitations for the first 12-months of operation.
3. The permittee shall maintain monthly records of the following information for emissions units B050 and B051, and the air contaminant sources that comprise the heating and ventilation system, inclusive, for this facility:
 - a. The monthly volume of natural gas used, in million(s) of standard cubic feet;
 - b. The rolling, 12-month summation of natural gas used, in million(s) of standard cubic feet;
 - c. The monthly PE, NO_x, CO, SO₂ and VOC emission rates; and
 - d. The rolling, 12-month summation of PE, NO_x, CO, SO₂ and VOC emission rates.
4. The permittee shall submit quarterly deviation (excursion) reports for emissions units B050 and B051, and the air contaminant sources that comprise the heating and ventilation system,

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inclusive, for this facility which identify all exceedances of the following:

- a. Rolling, 12-month natural gas usage limitation of 467 million standard cubic feet; and
- b. The rolling, 12-month emission limitation(s) for PE, NO_x, CO, SO₂ and VOC.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section A.1.

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

Emission Limitations:

0.45 ton PE per rolling, 12-month summation;
23.8 tons NO_x per rolling, 12-month summation;
19.99 tons CO per rolling, 12-month summation;
0.14 ton SO₂ per rolling, 12-month summation; and
1.31 tons VOC per rolling, 12-month summation.

Applicable Compliance Method:

The rolling, 12-month emission limitations were established by multiplying the natural gas usage limitation, 476 million standard cubic feet, by the emissions factors identified in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Tables 1.4-1 (9/98) and 1.4-2 (9/98). The emissions factors are: 1.9 lbs PE/million scf; 100 lbs NO_x/million scf; 84 lbs CO/million scf; 0.6 lb SO₂/million scf; and 5.5 lbs VOC/million scf. The result of the emissions are then divided by 2000 lbs/ton.

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

None

Honda
PTI A

Emissions Unit ID: **B050**

Issued: **To be entered upon final issuance**

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>	
B050 - 11.9 mmBtu/hr natural gas fired boiler	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-10(B)(1)
		OAC rule 3745-21-08(B)
		OAC rule 3745-21-07(B) OAC rule 3745-23-06(B)

Applicable Emissions
Limitations/Control
Measures

Particulate emissions (PE) shall not exceed 0.002 lb/mmBtu and 0.1 ton per year (TPY)

Nitrogen oxide (NO_x) emissions shall not exceed 0.098 lb/mmBtu and 5.11 TPY.

Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu and 4.29 TPY.

Sulfur dioxide (SO₂) emissions shall not exceed 0.0006 lb/mmBtu and 0.03 TPY.

Volatile organic compound (VOC) emissions shall not exceed 0.0059 lb/mmBtu and 0.28 TPY.

Visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(B), 3745-21-08(B), and 3745-23-06(B).

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

See term A.I.2.c.

See term A.I.2.d.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and the emission limitations listed in term A.I.1 above.
- 2.b** The lb/mmBtu actual heat input and tons per year emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

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

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record keeping Requirements

For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Honda**PTI A**Emissions Unit ID: **B050****Issued: To be entered upon final issuance****IV. Reporting Requirements**

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1. Visible Emission Limitations:
10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method(s):

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, .

2. Emission Limitations:
0.002 lb/mmBtu, 0.1 TPY PE

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 1.9 lbs PE/10⁶scf (filterable) emission factor into lb NO_x/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO_x/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

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

3. Emission Limitations:
0.098 lb/mmBtu, 5.11 TPY NO_x emissions

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Emissions Unit ID: **B050**

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 100 lbs NO_x/10⁶

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scf emission factor into lb NO_x/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO_x/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

4. Emission Limitations:
0.082 lb/mmBtu, 4.29 TPY CO emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 84 lbs NO_x/10⁶ scf emission factor into lb CO/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

5. Emission Limitations:
0.0006 lb/mmBtu, 0.03 TPY SO₂ emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 0.6 lb SO₂/10⁶ scf emission factor into lb SO₂/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

Honda**PTI A**Emissions Unit ID: **B050****Issued: To be entered upon final issuance**

6. Emission Limitations:
0.0059 lb/mmBtu, 0.28 TPY VOC emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 5.5 lbsVOC/10⁶ scf emission factor into lb VOC/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb VOC/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 25 or 25A.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B050 - 11.9 mmBtu/hr natural gas fired boiler		

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Honda**PTI A**Emissions Unit ID: **B051****Issued: To be entered upon final issuance**

Applicable Emissions Limitations/Control Measures	rules 3745-21-07(B), 3745-21-08(B), and 3745-23-06(B).
Particulate emissions (PE) shall not exceed 0.002 lb/mmBtu and 0.1 tons per year (TPY)	The emission limitation specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Nitrogen oxide (NO _x) emissions shall not exceed 0.098 lb/mmBtu and 5.11 TPY.	See term A.I.2.c.
Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu and 4.29 TPY.	See term A.I.2.d.
Sulfur dioxide (SO ₂) emissions shall not exceed 0.0006 lb/mmBtu and 0.03 TPY.	
Volatile organic compound (VOC) emissions shall not exceed 0.0059 lb/mmBtu and 0.28 TPY.	
Visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.	
The requirements of this rule also include compliance with the requirements of OAC	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and the emission limitations listed in term A.I.1 above.
- 2.b** The lb/mmBtu actual heat input and tons per year emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

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

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record keeping Requirements

For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

1. Visible Emission Limitations:

10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method(s):

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, .

2. Emission Limitations:

0.002 lb/mmBtu, 0.1 TPY PE

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 1.9 lbs PE/10⁶scf (filterable) emission factor into lb NO_x/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO_x/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

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

3. Emission Limitations:

0.098 lb/mmBtu, 5.11 TPY NO_x emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 100 lbs NO_x/10⁶ scf emission factor into lb NO_x/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance

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with the annual emission limitation may be demonstrated by multiplying the lb NO_x/mmBtu

value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

4. Emission Limitations:
0.082 lb/mmBtu, 4.29 TPY CO emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 84 lbs NO_x/10⁶ scf emission factor into lb CO/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

5. Emission Limitations:
0.0006 lb/mmBtu, 0.03 TPY SO₂ emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 0.6 lb SO₂/10⁶ scf emission factor into lb SO₂/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

Honda of America Mfg Inc
PTI Application: 05-12019
Issued

Facility ID: 0575000174

Emissions Unit ID: B051

6. Emission Limitations:
0.0059 lb/mmBtu, 0.28 TPY VOC emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 5.5 lbsVOC/10⁶ scf emission factor into lb VOC/mmBtu by dividing by 1,020 mmBtu/10⁶ scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb VOC/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 25 or 25A.

VI. Miscellaneous Requirements

None

Hond
PTI A

Emissions Unit ID: **B051**

Issued: **To be entered upon final issuance**

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>
B051 - 11.9 mmBtu/hr natural gas fired boiler		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 05-12918 Facility ID: 0575000174

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Two (2) natural gas fired boilers rated at 11.9 mmBtu/hr each CITY/TWP Anna

SIC CODE 3714 SCC CODE 1-01-006-01 EMISSIONS UNIT ID B050

EMISSIONS UNIT DESCRIPTION 11.9 mmBtu/hr natural gas fired boiler

DATE INSTALLED 07/2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	na	0.002 lb/mmBtu	0.1	0.002 lb/mmBtu	0.1
PM ₁₀					
Sulfur Dioxide	attainment	0.0006 lb/mmBtu	0.03	0.0006 lb/mmBtu	0.03
Organic Compounds	attainment	0.0059 lb/mmBtu	0.28	0.0059 lb/mmBtu	0.28
Nitrogen Oxides	attainment	0.098 lb/mmBtu	5.11	0.098 lb/mmBtu	5.11
Carbon Monoxide	attainment	0.082 lb/mmBtu	4.29	0.082 lb/mmBtu	4.29
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no

NESHAP? no

PSD? no

OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with burning only natural gas, and compliance with the 10% opacity limitation.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

