

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 05-13486

**A. Source Description**

Honda of America Manufacturing, Inc. has requested synthetic minor limits for the Anna Engine Plant (AEP) for the EQ stationary engine test unit. The unit is a engine dynamometer used to perform a quality assurance check on four (4) and six (6) cylinder engines.

**B. Facility Emissions and Attainment Status**

Honda of America Mfg., Inc - AEP is a minor stationary source for all pollutants. With federally enforceable limits, the facility-wide potential emissions remain below new source review major source thresholds for all criterial pollutants.

Honda of America Mfg., Inc - AEP is located in Shelby County with is attainment for all criteria pollutants.

**C. Source Emissions**

The emissions from the stationary test unit include nitrogen oxides, carbon monoxide, volatile organic compounds, particulate emissions, and sulfur dioxide. The emissions are limited by federally enforceable production and usage limitations which are based upon rolling, 12-month summations. The unit is limited to testing 48,000 engines per rolling, 12-month summation, and it also shall not exceed a gasoline usage limitation of 15,360 gallons per rolling, 12-month summation.

With the combined production and fuel usage limitations, the EQ stationary engine test unit will not exceed 0.04 tons of particulatee emissions, 0.03 tons of sulfur dioxide emissions, 0.01 tons of nitrogen oxide emissions, 3.46 tons of carbon monoxide emissions, and 1.84 tons of volatile organic compound emissions.

**D. Conclusion**

The federally enforceable production and fuel usage limitations, as well as, monthly record keeping and quarterly reporting requirements will ensure that Honda does not exceed the emission limitations required by this permit. Therefore, Honda of America Mfg., Inc. - AEP will remain below major New Source Review thresholds of 250 tons for all criteria pollutants.



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:** 05-13486

**Fac ID:** 0575000174

**DATE:** 10/12/2004

Honda of America Mfg Inc  
Paul Huwer  
12500 MERANDA RD  
ANNA, OH 45302-9699

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 **\$200** 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

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-13486 FOR AN AIR CONTAMINANT SOURCE FOR  
Honda of America Mfg Inc**

On 10/12/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America Mfg Inc**, located at **12500 Meranda Rd, Anna**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-13486:

**stationary engine testing for QA/QC.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Phil Hinrichs, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911  
[(937)285-6357]



**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 05-13486**

Application Number: 05-13486  
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 45302-9699

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

Description of proposed emissions unit(s):  
**Stationary engine testing for QA/QC.**

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

Facility ID: 0575000174

PTI Application: 05-13486

Issued: To be entered upon final issuance

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 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.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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

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.

**Honda of America Mfg Inc**

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**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.

## **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

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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.

**Honda of America Mfg Inc**

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

**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 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 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 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.

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**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

**Honda of America Mfg Inc**

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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	0.04
SO <sub>2</sub>	0.03
NO <sub>x</sub>	0.01
VOC	1.84
CO	3.46

**Honda of America Mfg Inc**

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**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

Honda  
PTI A

Emissions Unit ID: P092

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>	
		OAC rule 3745-17-11
P092 - Engine quality (EQ) stationary test fire	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-21-08(B)
		OAC rule 3745-18-06(G)
		OAC rule 3745-21-07(B)
		OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(C)	
		OAC rule 3745-17-07(A)

Applicable Emissions  
Limitations/Control  
Measures

0.04 lb of particulate emissions (PE)/hr;  
0.03 lb of sulfur dioxide (SO2)/hr;  
0.01 lbs of nitrogen oxides (NOx)/hr;  
1.84 lbs of volatile organic compounds (VOC)/hr; and  
3.46 lbs of carbon monoxide (CO)/hr

See additional term & condition in Part III.A.I.2.e.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).

0.04 ton PE/rolling, 12-month summation  
0.03 ton of SO2/rolling, 12-month summation  
0.01 tons of NOx/rolling, 12-month summation  
1.84 tons of VOC/rolling, 12-month summation  
3.46 tons of CO/rolling, 12-month summation

See additional term & condition in Part III.A.I.2a.

See additional term & condition in Part III.A.I.2b.

See additional term & condition in Part III.A.I.2c.

See additional term &

condition in Part III.A.2d.

See additional term & condition in Part III.A.2c.

See additional term & condition in Part III., A.2c.

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

**2.a** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

**2.b** The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(I), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.\*

\* The only materials introduced into this process are gaseous fuels and liquid fuels that are used solely as fuels for the purpose of combustion.

**2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and 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) in this permit to install.

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 the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, 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** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

**2.e** The pound per hour limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

**II. Operational Restrictions**

1. The permittee shall employ only unleaded fuel when operating this emissions unit.
2. The maximum number of engines tested within this emissions unit shall not exceed 48,000, based upon a rolling, 12-month summation of the engines tested within this emission unit.

**Honda**  
**PTI A**

Emissions Unit ID: P092

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

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the number of engines tested as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative engines tested</u>
1 thru 3	12,000
4 thru 6	24,000
7 thru 9	36,000
10 thru 12	48,000

3. The maximum unleaded gasoline usage for this emissions unit shall not exceed 15,360 gallons, based upon a rolling, 12-month summation of the unleaded gasoline usage for this emission unit.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the unleaded gasoline usage as specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative unleaded gasoline usage (gallons)</u>
1 thru 3	3,840
4 thru 6	7,680
7 thru 9	11,520
10 thru 12	15,360

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

1. For each day when the permittee burns a fuel other than unleaded fuel within this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. the number of engines tested;
  - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the number of engines tested;
 

also, during the first 12 calendar months of operation, the permittee shall record the cumulative number of engines tested for each calendar month;
  - c. the gallons of unleaded gasoline employed;

- d. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the gallons of gasoline employed;
- also, during the first 12 calendar months of operation, the permittee shall record the cumulative gallons of gasoline employed for each calendar month;

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

1. The Permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than unleaded fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month summation of engines tested limitation of 48,000;
  - b. all exceedances of the rolling, 12-month summation of the unleaded gasoline usage limitation of 15,360 gallons;
  - c. all exceedances of the rolling, 12-month emissions limitations of 0.04 ton PE, 0.03 ton of SO<sub>2</sub>, 0.01 tons of NO<sub>x</sub>, 1.84 tons of VOC, and 3.46 tons of CO.

These reports shall be due by the dates specified in Part I - General Terms and Conditions of this permit.

#### **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. Emissions Limitations:  
0.04 lb of PE/hr, 0.03 lb of SO<sub>2</sub>/hr, and 1.84 lbs of VOC/hr

Applicable Compliance Method:

Compliance with the hourly PE, SO<sub>2</sub> and VOC emission limitation may be determined as follows:

$$E_r = (E_f)(MGR)(MER)(PV)$$

where,

$E_r$  = maximum hourly emission rate;

$E_f$  = the emissions factor of 0.004 lb PE/gallon, 0.003 lb SO<sub>2</sub>/gal or 0.2 lb VOC/gal, as applicable (Based on June 2001 emission test at HRA-O)

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

MGR = the maximum gas usage rate of 0.320 gal/engine

MER = the maximum engine rate of 24 engines/hr

PV = Process Variability, 1.2, to account for a 20% engine displacement variability

2. Emissions Limitations:  
0.1 lb NO<sub>x</sub>/hr and 3.46 lbs CO/hr

Applicable Compliance Method:

Compliance with the hourly NO<sub>x</sub> and CO emission limitation may be determined as follows:

$$E_r = (E_f)(MER)(PV)$$

where,

$E_r$  = maximum hourly emission rate;

$E_f$  = the emissions factor of 4.76 EE-4 lb NO<sub>x</sub>/engine test or 0.12 lb CO/engine test (Based on Honda Anna 01/31/02 test of 3.5 L V6)

MER = the maximum engine rate of 24 engines/hr

PV = Process Variability, 1.2, to account for a 20% engine displacement variability

3. Emissions Limitations:  
0.04 tons PE, 0.03 tons SO<sub>2</sub>, and 1.84 tons VOC per rolling, 12-month summations

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitations for PE, SO<sub>2</sub> and VOC are based upon the record keeping requirement Term A.III.2. If compliance with the rolling, 12-month gasoline usage limitation of 15,360 gallons is demonstrated then compliance with the emission limitations are also demonstrated. Emission calculations may be determined by the following equation:

$$E_r = (E_f)(MGR)(MER)(PV)/(2000 \text{ lbs/ton})$$

where,

$E_r$  = maximum emission rate

$E_f$  = the emissions factor of 0.004 lb PE/gallon, 0.003 lb SO<sub>2</sub>/gal or 0.2 lb VOC/gal, as applicable (Based on June 2001 emission test at HRA-O)

MGR = the maximum gas usage rate 15,360 gal/rolling, 12-month summation

PV = Process Variability, 1.2, to account for a 20% engine displacement variability

4. Emissions Limitations:  
0.1 tons NOx and 3.46 tons CO per rolling, 12-month summations

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitations for NOx and CO are based upon the record keeping requirement Term A.III.2. If compliance with the rolling, 12-month engine test limitation of 48,000 engines is demonstrated then compliance with the emission limitations are also demonstrated. Emission calculations may be determined by the following equation:

$$E_r = (E_f)(MER)(PV)/(2000 \text{ lbs/ton})$$

where,

$E_r$  = maximum emission rate

$E_f$  = the emissions factor of 4.76 EE-4 lb NOx/engine test or 0.12 lb CO/engine test (Based on Honda Anna 01/31/02 test of 3.5 L V6)

MER = the maximum engine rate of 48,000 engines per rolling, 12-month summation

PV = Process Variability, 1.2, to account for a 20% engine displacement variability

## **VI. Miscellaneous Requirements**

None

**Honda  
PTI A**

Emissions Unit ID: P092

**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>
P092 - Engine quality (EQ) stationary test fire		

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None