



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

RE: PERMIT TO INSTALL MODIFICATION  
UNION COUNTY  
Application No: 01-06771

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 7/18/00

Honda R&D Americas  
Sue Borawski  
21001 St Rt 739  
Raymond, OH 43067

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 7/18/00  
Effective Date: 7/18/00**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-06771

Application Number: **01-06771**

APS Premise Number: **0180000156**

Permit Fee: **\$500**

Name of Facility: **Honda R&D Americas**

Person to Contact: **Sue Borawski**

Address: **21001 St Rt 739  
Raymond, OH 43067**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**21001 St Rt 739  
Raymond, OHIO**

Description of modification:  
**Dynamometer.**

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

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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance

with OAC rule 3745-15-06.) See B.14 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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.

## **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 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
  - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.

- ii. Compliance certifications shall include the following:
  - (a) An identification of each term or condition of this permit that is the basis of the certification.
  - (b) The permittee's current compliance status.
  - (c) Whether compliance was continuous or intermittent.
  - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## **10. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

## **11. Title V Permit To Operate Application**

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.

**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 Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements**

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.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of

records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. 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.

**8. 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.

**9. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

**10. 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.

**11. 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).

**12. 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.

**13. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

**14. 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>
CO	22.56
OC	32.4
NO <sub>x</sub>	22.3
PM	1.415
SO <sub>x</sub>	1.16

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
Performance Dynamometer in building #5	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), and see A.I.2.a below.
	OAC rule 3745-21-08(B)	See A.I.2.b below.
	OAC rule 3745-23-06(B)	See A.I.2.b below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
	OAC rule 3745-31-05(A)(3)	Hourly emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:
		0.0647 lb of particulate emissions/hr 0.0531 lb of sulfur dioxide/hr 1.02 lbs of nitrogen oxides/hr 1.48 lbs of organic compounds/hr 0.79 lb of carbon monoxide/hr
		Annual emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:
		0.283 ton of particulate emissions/yr 0.232 ton of sulfur dioxide/yr

4.46 tons of nitrogen oxides/yr 6.48 tons of organic compounds/yr 3.45 ton of carbon monoxide/yr
--

**2. Additional Terms and Conditions**

- a. The internal combustion engines used in association with this emissions unit have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.
- b. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in this permit.
- c. The particulate, nitrogen oxides, sulfur dioxide, and organic compound emission limitations specified in Section A.I.1 reflect the emissions unit's potential to emit for these pollutants; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

**II. Operational Restrictions**

- 1. This emissions unit shall be vented to a thermal incinerator which shall reduce carbon monoxide emissions to not more than 0.79 pound per hour.
- 2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information each day for the control equipment:
  - a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

- b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- 1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted as required in the General Terms and Conditions, Part I, Section A.1.c.
- 2. The permittee shall submit annual reports which specify the total emissions of particulates, sulfur dioxide, nitrogen oxides, organic compounds, and carbon monoxide from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- 1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

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

- b. Emission Limitation

0.79 lb CO/hr  
3.45 ton CO/yr

Applicable Compliance Method

The carbon monoxide emission limitations for this emissions unit were established by using an emission factor of 3,940 lbs of carbon monoxide/1,000 gallons of gasoline combusted multiplied by the emissions unit's maximum hourly gasoline combustion rate (10 gallons/hr) and by the carbon monoxide loss after control (2%). The emission factor is from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines.

The carbon monoxide emission limits for this emissions unit shall be calculated as follows:

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 2\% = 0.79 \text{ lbs CO/hr}$ , and

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$ , or

$3.94 \text{ lbs CO/gal} \times 87,600 \text{ gal/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$

Stack tests conducted 10/22/98 and 4/15/99 demonstrated 99.99% and 99.87% control consecutively, of this limit, with the representative emissions from this emissions unit equaling 0.004 lb/hr and 0.052 lb/hr.

If additional testing were required, compliance with the hourly carbon monoxide emission limitation would be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

c. Emission Limitation

1.48 lbs VOC/hr  
6.48 Tons VOC/yr  
1.02 lbs NO<sub>x</sub>/hr  
4.46 Tons NO<sub>x</sub>/yr  
0.0647 lb PM/hr  
0.283 Tons PM/yr  
0.053 lb SO<sub>x</sub>/hr  
0.232 Ton SO<sub>x</sub>/yr

Applicable Compliance Method

Compliance with the organic compound, nitrogen oxides, particulates, and sulfur dioxide emission limitations for this emissions unit shall be determined by multiplying the maximum gasoline usage for this emissions unit, 10 gallons per hour and 87,600 gallons per year, by emissions factors from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines. These emission factors, which are stated in pounds of pollutant per 1000 gallons of gasoline combusted, are as follows:

6.47 lbs of particulate emissions/1000 gallons gasoline combusted  
5.31 lbs of sulfur dioxide/1000 gallons gasoline combusted  
102 lbs of nitrogen oxides/1000 gallons gasoline combusted  
148 lbs of organic compounds/1000 gallons gasoline combusted

This represents the potential to emit for this emissions unit, therefore no recordkeeping is necessary to show compliance. If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the appropriate approved method(s) found in 40 CFR Part 60, Appendix A.

**Honda R & D Americas**

**PTI Application: 01-6771**

**Date: 7/18/00**

Facility ID: **0180000156**

Emissions Unit ID: **B013**

**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>
Performance Dynamometer in building #5		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None.

**Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]**

**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>
Performance Dynamometer in building #5	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), and see A.I.2.a below.
	OAC rule 3745-21-08(B)	See A.I.2.b below
	OAC rule 3745-23-06(B)	See A.I.2.b below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
	OAC rule 3745-31-05(A)(3)	Hourly emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.0647 lb of particulate emissions/hr 0.0531 lb of sulfur dioxide/hr 1.02 lbs of nitrogen oxides/hr 1.48 lbs of organic compounds/hr 0.79 lb of carbon monoxide/hr  Annual emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.283 ton of particulate emissions/yr 0.232 ton of sulfur dioxide/yr

4.46 tons of nitrogen oxides/yr 6.48 tons of organic compounds/yr 3.45 ton of carbon monoxide/yr
--

## **2. Additional Terms and Conditions**

- a. The internal combustion engines used in association with this emissions unit have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.
- b. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in this permit.
- c. The particulate, nitrogen oxides, sulfur dioxide, and organic compound emission limitations specified in Section A.I.1 reflect the emissions unit's potential to emit for these pollutants; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

## **II. Operational Restrictions**

1. This emissions unit shall be vented to a thermal incinerator which shall reduce carbon monoxide emissions to not more than 0.79 pound per hour.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- 1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted as required in the General Terms and Conditions, Part I, Section A.1.c.

The permittee shall submit annual reports which specify the total emissions of particulates, sulfur dioxide, nitrogen oxides, organic compounds, and carbon monoxide from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- 1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

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

- b. Emission Limitation

0.79 lb CO/hr  
3.45 ton CO/yr

Applicable Compliance Method

The carbon monoxide emission limitations for this emissions unit were established by using

an emission factor of 3,940 lbs of carbon monoxide/1,000 gallons of gasoline combusted multiplied by the emissions unit's maximum hourly gasoline combustion rate (10 gallons/hr) and by the carbon monoxide loss after control (2%). The emission factor is from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines.

The carbon monoxide emission limits for this emissions unit shall be calculated as follows:

$$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 2\% = 0.79 \text{ lbs CO/hr, and}$$

$$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr, or}$$

$$3.94 \text{ lbs CO/gal} \times 87,600 \text{ gal/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$$

Stack tests conducted 10/22/98 and 4/15/99 demonstrated 99.99% and 99.87% control consecutively, of this limit, with the representative emissions from this emissions unit equaling 0.004 lb/hr and 0.052 lb/hr.

If additional testing were required, compliance with the hourly carbon monoxide emission limitation would be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

c. Emission Limitation

1.48 lbs VOC/hr  
6.48 Tons VOC/yr  
1.02 lbs NO<sub>x</sub>/hr  
4.46 Tons NO<sub>x</sub>/yr  
0.0647 lb PM/hr  
0.283 Tons PM/yr  
0.053 lb SO<sub>x</sub>/hr  
0.232 Ton SO<sub>x</sub>/yr

Applicable Compliance Method

Compliance with the organic compound, nitrogen oxides, particulates, and sulfur dioxide emission limitations for this emissions unit shall be determined by multiplying the maximum gasoline usage for this emissions unit, 10 gallons per hour and 87,600 gallons per year, by emissions factors from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines. These emission factors, which are stated in pounds of pollutant per 1000 gallons of gasoline combusted, are as follows:

6.47 lbs of particulate emissions/1000 gallons gasoline combusted  
5.31 lbs of sulfur dioxide/1000 gallons gasoline combusted  
102 lbs of nitrogen oxides/1000 gallons gasoline combusted  
148 lbs of organic compounds/1000 gallons gasoline combusted

**Honda R & D Americas**

**PTI Application: 01-6771**

**Date: 7/18/00**

Facility ID: **0180000156**

Emissions Unit ID:**B014**

This represents the potential to emit for this emissions unit, therefore no recordkeeping is necessary to show compliance.

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the appropriate approved method(s) found in 40 CFR Part 60, Appendix A.

**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>
Performance Dynamometer in building #5		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None.

**Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]**

**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>
Durability Dynamometer in building #5	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), and see A.I.2.a below.
	OAC rule 3745-21-08(B)	See A.I.2.b below
	OAC rule 3745-23-06(B)	See A.I.2.b below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
	OAC rule 3745-31-05(A)(3)	Hourly emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.0647 lb of particulate emissions/hr 0.0531 lb of sulfur dioxide/hr 1.02 lbs of nitrogen oxides/hr 1.48 lbs of organic compounds/hr 0.79 lb of carbon monoxide/hr  Annual emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.283 ton of particulate emissions/yr 0.232 ton of sulfur dioxide/yr

4.46 tons of nitrogen oxides/yr 6.48 tons of organic compounds/yr 3.45 ton of carbon monoxide/yr
--

**2. Additional Terms and Conditions**

- a. The internal combustion engines used in association with this emissions unit have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.
- b. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in this permit.
- c. The particulate, nitrogen oxides, sulfur dioxide, and organic compound emission limitations specified in Section A.I.1 reflect the emissions unit's potential to emit for these pollutants; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

**II. Operational Restrictions**

- 1. This emissions unit shall be vented to a thermal incinerator which shall reduce carbon monoxide emissions to not more than 0.79 pound per hour.
- 2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted as required in the General Terms and Conditions, Part I, Section A.1.c.
2. The permittee shall submit annual reports which specify the total emissions of particulates, sulfur dioxide, nitrogen oxides, organic compounds, and carbon monoxide from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

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

- b. Emission Limitation

0.79 lb CO/hr  
3.45 ton CO/yr

Applicable Compliance Method

The carbon monoxide emission limitations for this emissions unit were established by using

an emission factor of 3,940 lbs of carbon monoxide/1,000 gallons of gasoline combusted multiplied by the emissions unit's maximum hourly gasoline combustion rate (10 gallons/hr) and by the carbon monoxide loss after control (2%). The emission factor is from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines.

The carbon monoxide emission limits for this emissions unit shall be calculated as follows:

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 2\% = 0.79 \text{ lbs CO/hr}$ , and

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$ , or

$3.94 \text{ lbs CO/gal} \times 87,600 \text{ gal/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$

Stack tests conducted 10/22/98 and 4/15/99 demonstrated 99.99% and 99.87% control consecutively, of this limit, with the representative emissions from this emissions unit equaling 0.004 lb/hr and 0.052 lb/hr.

If additional testing were required, compliance with the hourly carbon monoxide emission limitation would be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

c. Emission Limitation

1.48 lbs VOC/hr  
6.48 Tons VOC/yr  
1.02 lbs NO<sub>x</sub>/hr  
4.46 Tons NO<sub>x</sub>/yr  
0.0647 lb PM/hr  
0.283 Tons PM/yr  
0.053 lb SO<sub>x</sub>/hr  
0.232 Ton SO<sub>x</sub>/yr

Applicable Compliance Method

Compliance with the organic compound, nitrogen oxides, particulates, and sulfur dioxide emission limitations for this emissions unit shall be determined by multiplying the maximum gasoline usage for this emissions unit, 10 gallons per hour and 87,600 gallons per year, by emissions factors from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines. These emission factors, which are stated in pounds of pollutant per 1000 gallons of gasoline combusted, are as follows:

6.47 lbs of particulate emissions/1000 gallons gasoline combusted  
5.31 lbs of sulfur dioxide/1000 gallons gasoline combusted  
102 lbs of nitrogen oxides/1000 gallons gasoline combusted  
148 lbs of organic compounds/1000 gallons gasoline combusted

This represents the potential to emit for this emissions unit, therefore no recordkeeping is necessary to show compliance.

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the appropriate approved method(s) found in 40 CFR Part 60, Appendix A.

**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>
Durability Dynamometer in building #5		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None.

**Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]**

**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>
Transmission Dynamometer in building #5	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), and see A.I.2.a below.
	OAC rule 3745-21-08(B)	See A.I.2.b below
	OAC rule 3745-23-06(B)	See A.I.2.b below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B)
	OAC rule 3745-31-05(A)(3)	Hourly emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.0647 lb of particulate emissions/hr 0.0531 lb of sulfur dioxide/hr 1.02 lbs of nitrogen oxides/hr 1.48 lbs of organic compounds/hr 0.79 lb of carbon monoxide/hr  Annual emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.283 ton of particulate emissions/yr 0.232 ton of sulfur dioxide/yr

4.46 tons of nitrogen oxides/yr
6.48 tons of organic compounds/yr
3.45 ton of carbon monoxide/yr

## **2. Additional Terms and Conditions**

- a. The internal combustion engines used in association with this emissions unit have a rated power of less than or equal to 600 horsepower and are not used to, or intended to, propel any vehicle.
- b. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in this permit.
- c. The particulate, nitrogen oxides, sulfur dioxide, and organic compound emission limitations specified in Section A.I.1 reflect the emissions unit's potential to emit for these pollutants; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

## **II. Operational Restrictions**

1. This emissions unit shall be vented to a thermal incinerator which shall reduce carbon monoxide emissions to not more than 0.79 pound per hour.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day for the control equipment:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These reports shall be submitted as required in the General Terms and Conditions, Part I, Section A.1.c.
2. The permittee shall submit annual reports which specify the total emissions of particulates, sulfur dioxide, nitrogen oxides, organic compounds, and carbon monoxide from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method

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

- b. Emission Limitation

0.79 lb CO/hr  
3.45 ton CO/yr

Applicable Compliance Method

The carbon monoxide emission limitations for this emissions unit were established by using an emission factor of 3,940 lbs of carbon monoxide/1,000 gallons of gasoline combusted multiplied by the emissions unit's maximum hourly gasoline combustion rate (10 gallons/hr) and by the carbon monoxide loss after control (2%). The emission factor is from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines.

The carbon monoxide emission limits for this emissions unit shall be calculated as follows:

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 2\% = 0.79 \text{ lbs CO/hr}$ , and

$3.94 \text{ lbs CO/gal} \times 10 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$ , or

$3.94 \text{ lbs CO/gal} \times 87,600 \text{ gal/yr} \times 1 \text{ ton}/2000 \text{ lbs} \times 2\% = 3.45 \text{ tons CO/yr}$

Stack tests conducted 10/22/98 and 4/15/99 demonstrated 99.99% and 99.87% control consecutively, of this limit, with the representative emissions from this emissions unit equaling 0.004 lb/hr and 0.052 lb/hr.

If additional testing were required, compliance with the hourly carbon monoxide emission limitation would be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

c. Emission Limitation

1.48 lbs VOC/hr  
6.48 Tons VOC/yr  
1.02 lbs NO<sub>x</sub>/hr  
4.46 Tons NO<sub>x</sub>/yr  
0.0647 lb PM/hr  
0.283 Tons PM/yr  
0.053 lb SO<sub>x</sub>/hr  
0.232 Ton SO<sub>x</sub>/yr

Applicable Compliance Method

Compliance with the organic compound, nitrogen oxides, particulates, and sulfur dioxide emission limitations for this emissions unit shall be determined by multiplying the maximum gasoline usage for this emissions unit, 10 gallons per hour and 87,600 gallons per year, by emissions factors from the U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines. These emission factors, which are stated in pounds of pollutant per 1000 gallons of gasoline combusted, are as follows:

6.47 lbs of particulate emissions/1000 gallons gasoline combusted  
5.31 lbs of sulfur dioxide/1000 gallons gasoline combusted  
102 lbs of nitrogen oxides/1000 gallons gasoline combusted

148 lbs of organic compounds/1000 gallons gasoline combusted

This represents the potential to emit for this emissions unit, therefore no recordkeeping is necessary to show compliance.

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the appropriate approved method(s) found in 40 CFR Part 60, Appendix A.

**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>
Transmission Dynamometer in building #5		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None.

**Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]**

**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>
Emissions Dynamometer in building #5	OAC rule 3745-17-07(A)	None, see A.I.2.b below.
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.a below.
	OAC rule 3745-21-08(B)	None, see A.I.2.c below.
	OAC rule 3745-23-06(B)	None, see A.I.2.c below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B).
	OAC rule 3745-31-05(A)(3)	Hourly emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.0647 lb of particulate emissions/hr 0.0531 lb of sulfur dioxide/hr 1.02 lbs of nitrogen oxides/hr 1.48 lbs of organic compounds/hr 2.0 lbs of carbon monoxide/hr  Annual emissions from the combustion of gasoline in this emissions unit shall not exceed the following limitations:  0.283 ton particulate emissions/yr 0.232 ton of sulfur dioxide/yr 4.46 tons of nitrogen oxides/yr 6.48 tons of organic compounds/yr 8.76 tons of carbon monoxide/yr
		Visible particulate emissions shall not exceed 20% opacity as a 6-minute

| average.

## **2. Additional Terms and Conditions**

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), 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.
- b. 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.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 (Control of carbon monoxide emissions from stationary sources) and 3745-23-06 (Control of nitrogen oxides emissions from stationary sources), respectively by committing to comply with the best available technology requirements established in this permit.
- d. The hourly and annual emission limitations specified in Section A.I.1 reflect the emissions unit's potential to emit for these pollutants; therefore, there are no additional monitoring, record keeping or reporting requirements associated with these emission limitations.

## **II. Operational Restrictions**

None.

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

1. The permittee shall perform weekly checks, when the weather conditions allow, for any visible particulate emissions from all the stacks serving the uncontrolled dynamometers which are in operation at the time of the weekly checks. At a minimum, the visible particulate emissions from each uncontrolled dynamometer stack shall be checked on a quarterly basis unless the dynamometer does not operate during the calendar quarter. The facility shall maintain records showing the operation time(s) of each dynamometer during each calendar quarter. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

The visible emissions check is not required to be performed by individuals certified to conduct U.S. EPA Reference Method 9 observations.

No earlier than 6 months from issuance of this permit, the permittee may, upon receipt of written approval from the Ohio EPA Central District Office, modify the frequencies of the visible particulate emissions checks if operating experience indicates that less frequent checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified visible particulate emissions check frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

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

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any of the stacks serving the uncontrolled dynamometers and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports which specify the total emissions of particulates, sulfur dioxide, nitrogen oxides, organic compounds, and carbon monoxide from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation

2.0 lbs CO/hr

8.76 tons CO/yr

Applicable Compliance Method

The maximum uncontrolled hourly carbon monoxide emissions were established using an emission factor of 0.2 pound of carbon monoxide per gallon of gasoline and a maximum gasoline usage of 10 gallons per hour (this emission factor was derived from the highest dynamometer testing results, from testing conducted on 8/20/97 on an uncontrolled V6 engine at maximum operating conditions on dynamometer B018). The annual carbon monoxide emission limitation was established by multiplying the worst case hourly emission rate (2.0 lbs/hr) by 8760 hours per year.

Uncontrolled emissions shall be calculated as follows:

annual emissions:  $0.20 \text{ lbs. CO/gal} \times 10 \text{ gal/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs} = 8.76 \text{ TPY CO}$

hourly emissions:  $0.20 \text{ lbs CO/gal} \times 10 \text{ gal/hr} = 2 \text{ lbs CO/hr}$

These calculations are computed at maximum potential operating conditions, therefore no record-keeping is necessary to show compliance with these limits.

Stack tests conducted on this emissions unit on 5/11/98 demonstrated emissions of 0.054 pounds of CO per hour. If additional testing were required, compliance with the hourly carbon monoxide emission limitation would be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

b. Emission Limitation

1.48 lbs VOC/hr  
6.48 Tons VOC/yr  
1.02 lbs NO<sub>x</sub>/hr  
4.46 Tons NO<sub>x</sub>/yr  
0.0647 lb PM/hr  
0.283 Tons PM/yr  
0.053 lb SO<sub>x</sub>/hr  
0.232 Ton SO<sub>x</sub>/yr

Applicable Compliance Method

Compliance with the organic compound, nitrogen oxides, particulates, and sulfur dioxide emission limitations for this emissions unit shall be determined by multiplying the maximum hourly gasoline usage rate for this emissions unit, 10 gallons per hour and 87,600 gallons per year, by emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE 6.01) for criteria air pollutants, using (SCC) number 20400401 for reciprocation gasoline engines. The emission factors for particulates, sulfur dioxide, nitrogen oxides, and organic compounds are specified below.

6.47 lbs of particulate emissions/1000 gallons of gasoline burned  
5.31 lbs of sulfur dioxide/1000 gallons of gasoline burned  
102 lbs of nitrogen oxides/1000 gallons of gasoline burned  
148 lbs of organic compounds/1000 gallons of gasoline burned

This represents the potential to emit for this emissions unit, therefore no recordkeeping is necessary to show compliance.

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the appropriate approved method(s) found in 40 CFR Part 60, Appendix A.

c. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method

If required, compliance with this emission limitation shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

**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>
Emissions Dynamometer in building #5		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None.

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

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.