

Synthetic Minor Determination and/or Netting Determination

Permit To Install **01-08782**

A. Source Description

Honda of America Mfg, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April 1996, Honda submitted a Title V application for the facility. Honda is requesting a permit to install a New Line 2 coating line at the automotive plant. The new Line 2 coating line will replace the existing Line 2 and allow an increase in the number of vehicles that can be coated by 100 per day. The New Line 2 consists of e-coat, primer/surfacer, topcoat, sealer and deadener, polish, sludge pits, and three sanding operations along with associated natural gas emissions sources such as control equipment and ovens.

B. Facility Emissions and Attainment Status

Honda is located in Union County, Ohio which is considered attainment for all pollutants. Honda's potential to emit is greater than 250 tons of VOC per year. Because potential and actual emissions are greater than 250 tons per year, the facility is considered major for PSD rule applicability. Honda has requested that this permit be issued as a netting permit with federally enforceable emission limitations to avoid triggering a major modification under PSD for VOC.

The new paint line project will result in VOC emissions of 517.9 tons per year, including all emissions from coatings and natural gas. All emissions associated with purge or cleanup materials are currently permitted under PTI 01-6743 and will not change. In order to achieve a net decrease of VOC emissions and avoid triggering PSD, Honda has taken credit for several emissions units that have been shutdown at the facility including the existing Line 2 which will be shutdown as soon as New Line 2 is producing salable products. Please refer to the detailed netting tables found in Part II of the Facility Terms and Conditions of this permit. The overall net decrease of VOC emissions will be 110.93 tons per year.

The netting determination was based on a contemporaneous time period of 1999-2006. The period begins five years prior to the start of construction for the project, which is proposed to occur in April 2004. The end of the period is when the project will begin normal operation (January 2006).

C. Source Emissions

In order to meet the VOC emission limitations specified above, Honda has proposed federally enforceable restrictions on the number of vehicles processed through New Line 2. This restriction applies to emissions units K235, K236, K237, K238, and K239. Emissions unit P341 (sludge pits) will be restricted by the number of gallons of water treatment chemicals added to the sludge pits. The sanding emissions units P342-344 do not have the potential to emit VOC's. The number of vehicles produced will be limited to 275,000 vehicles per year as measured at the assembly off (AF OFF) area.

Most of the emissions units will also have add-on control devices to control VOC. Emissions units K235, K236, and K238 will be controlled by a thermal incinerator and K237 will be controlled by a concentrator and thermal incinerator. The total federally enforceable limitation of VOC emissions included in this permit is 515.7 tons per rolling, 12-month period, excluding emissions from natural gas.

The natural gas VOC emissions from dryers, ovens, and the control devices will not be controlled by add-on devices. Honda has requested that the VOC emissions from natural gas have a federally enforceable restriction on the natural gas usage of 794,652,000 cubic feet per rolling, 12-month period. Natural gas emissions have a separate federally enforceable emission limitation of 2.19 tons of VOC per rolling, 12-month period.

D. Conclusion

The installation of New Line 2 will result in a net decrease of VOC emissions of 110.93 tons per year, which is less than the VOC significant level of 40 tons per year as specified by 40 CFR Part 52.21. Therefore, the proposed New Line 2 installation will "net out" and not trigger a required review of the application under PSD regulations. The permit includes federally enforceable limits, operational restrictions, monitoring, and reporting to ensure continual compliance with the requirements that will maintain these levels of emissions.

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **01-08782**

A. Source Description

Honda of America Mfg, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April 1996, Honda submitted a Title V application for the facility. Honda is requesting a permit to install a New Line 2 coating line at the automotive plant. The new Line 2 coating line will replace the existing Line 2 and allow an increase in the number of vehicles that can be coated by 100 per day. The New Line 2 consists of e-coat, primer/surfacer, topcoat, sealer and deadener, polish, sludge pits, and three sanding operations along with associated natural gas emissions sources such as control equipment and ovens.

B. Facility Emissions and Attainment Status

Honda is located in Union County, Ohio which is considered attainment for all pollutants. Honda's potential to emit is greater than 250 tons of VOC per year. Because potential and actual emissions are greater than 250 tons per year, the facility is considered major for PSD rule applicability. Honda has requested that this permit be issued as a synthetic permit with federally enforceable emission limitations to avoid triggering a major modification under PSD for particulate, CO, and NOx.

Honda has proposed federally enforceable limitations of 9.8 tons particulate per rolling 12 months from the coating and sanding operations and 3.02 tons particulate per rolling 12 months from natural gas combustion sources to avoid the PSD major modification trigger of 15 tons per year. Honda has also proposed federally enforceable emission limitations of 33.38 tons of CO per rolling, 12-month period and 39.73 tons of NOx per rolling, 12-month period.

C. Source Emissions

The New Paint line will generate particulate emissions from coating operations, sanding operations and natural gas combustion from the dryers, ovens, and control devices. CO and NOX emissions will be generated by natural gas combustion only. In order to meet the VOC emission limitations specified above, Honda has proposed federally enforceable restrictions on the number of vehicles processed through New Line 2 and natural gas usage restrictions. The vehicle restriction applies to emissions units K235, K236, and P342-P344. The natural gas usage restriction applies to emissions units K235, K236, K237, and K238.

Honda has requested that the number of vehicles produced will be limited to 275,000 vehicles per year as measured at the assembly off (AF OFF) area. Honda has requested that the natural gas usage have a federally enforceable restrictions of 794,652,000 cubic feet per rolling, 12-month period.

	<u>PTE Pre-Synthetic Minor PTI</u>	<u>PTE Post Synthetic Minor PTI</u>
Particulate	27.16 tons/yr	12.84 tons/yr
CO	60.14 tons/yr	33.38 tons/yr
NOx	71.61 tons/yr	39.73 tons/yr

D. Conclusion

The installation of New Line 2 will result in an increase of particulate, CO, and NOx emissions of that are less than the significant levels for each pollutant as specified by 40 CFR Part 52.21. Therefore, the proposed New Line 2 installation will not trigger a major modification under PSD regulations. The permit includes federally enforceable limits, operational restrictions, monitoring, and reporting to ensure continual compliance with the requirements that will maintain these levels of emissions.

UNION COUNTY

PUBLIC NOTICE PUBLIC HEARING
OHIO ENVIRONMENTAL PROTECTION AGENCY
ISSUANCE OF DRAFT AIR PERMIT TO INSTALL TO
HONDA OF AMERICA Mfg, INC.

Public notice is hereby given that the Ohio Environmental Protection Agency (EPA) has issued, on February 26, 2004, a draft action of an air Permit to Install (PTI) application number 01-08782 to Honda of America Mfg, Inc. This draft air permit proposes to allow the installation of a new automobile coating line that will replace the current automobile coating line number 2 at 24000 Honda Parkway, Marysville, Ohio. Since Honda proposes to replace their current automobile coating line number 2 with the installation of a new automobile coating line along with the shutting down of some other existing operations, Honda's existing Volatile Organic Compound (VOC) emissions will be reduced by over one hundred (100) tons per year and thereby avoid federal Prevention of Significant Deterioration (PSD) air regulations.

A public information meeting and public hearing on the draft air permit is scheduled for March 31, 2004, at Marysville Chamber of Commerce, 227 E. Fifth Street, Marysville, Ohio. The public information session will commence at 6:30 p.m. and the hearing will follow immediately to accept comments on the draft permit. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard.

All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing. Written comments must be received by the close of the business day on April 7, 2004. Comments received after this date will not be considered to be a part of the official record.

Written comments may be submitted at the hearing or sent to: Kelly Toth of the Ohio Environmental Protection Agency, Division of Air Pollution Control at 3232 Alum Creek Drive, Columbus, Ohio 43207.

Copies of the draft air permit application and technical support information may be reviewed and/or copies made by first calling to make an appointment at the Ohio Environmental Protection Agency, Division of Air Pollution Control, located at the above address, telephone number (614)728-5043.



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: DRAFT PERMIT TO INSTALL
UNION COUNTY
Application No: 01-08782**

CERTIFIED MAIL

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

DATE: 2/26/2004

Honda of America Mfg., Inc.
Joanna Bambeck
24000 Honda Parkway
Marysville, OH 430409190

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 **\$2400** 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.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



**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 01-08782

Application Number: 01-08782

APS Premise Number: 0180000130

Permit Fee: **To be entered upon final issuance**

Name of Facility: Honda of America Mfg., Inc.

Person to Contact: Joanna Bambeck

Address: 24000 Honda Parkway
Marysville, OH 430409190

Location of proposed air contaminant source(s) [emissions unit(s)]:

**24000 Honda Parkway
Marysville, Ohio**

Description of proposed emissions unit(s):

Paint line 2.

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

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.

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 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 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.

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.

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. 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.

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)

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-08782

Issued: To be entered upon final issuance

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>
VOC	517.9
Particulate	12.82
SO2	0.4
NOx	39.73
CO	33.38

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This permit to install shall cover the New Line 2 coating line and associated natural gas emissions from sources such as control equipment and ovens. New Line 2 consists of the following emissions units: New Line 2 e-coat (K235), New Line 2 primer/surfacer (K236), New Line 2 topcoat (K237), New Line 2 sealer/deadener and liquid applied sound deadener (K238), existing Line 1 and New Line 2 polish (K239), New Line 2 sludge pits (P341), New Line 2 e-coat sanding (P342), New Line 2 surfacer sanding (P343), and New Line 2 repair sanding (P344). The New Line 2 coating line will replace the entire existing Line 2 coating line with the exception of final repair (K007), Line 2 inner cavity wax (R003) and Line 2 wheel well blackout (K228). The existing Line 1 polish operations are included in this permit because those operations along with the New Line 2 polish operations are considered one emissions unit.

The permittee shall permanently shutdown the following emissions units of the existing Line 2 once the full production of the New Line 2 coating line has been achieved or within one year of starting salable production units in New Line 2: Line 2 e-coat (K002), Line 2 primer/surfacer (K003), Line 2 topcoat (K004), Line 2 sealer/deadener (R002), and Line 2 sludge pits (P306).

These shutdowns are required for the purpose of netting out of the Prevention of Significant Deterioration (PSD) and corresponding Ohio Administrative Code (OAC) regulations for volatile organic compounds (VOC), particulate, nitrogen oxides, and carbon monoxide with the installation of the New Line 2 coating line. In order to verify that the emissions from these pollutants do not exceed the emissions described in the netting table below during the transition to the New Line 2 coating line, the permittee must comply with the following limitations for all of the coating lines in operation including the existing Line 1, existing Line 2, and the new Line 2 combined (K201, K206, K208, R102, R103, K003, K004, R002, R003, K235, K236, K237, K238, K239, P341, P342, P343, and P344):

1,893 tons VOC per rolling, 12-month period for all paint line emissions units combined; and

470,000 vehicles per rolling, 12-month period for all paint line emissions units combined

The permittee shall keep sufficient records to demonstrate that these requirements are being met during the transition period.

The following tables include all emissions units at the Honda of America, Mfg. Inc. (HAM) plant that are being used to demonstrate a net decrease in VOC emissions for the entire facility. HAM consists of the East Liberty Auto Plant (ELP), the Marysville Motorcycle Plant (MMP), and the Marysville Auto Plant (MAP). The contemporaneous time period is from 1999-2006. The period begins five years prior to the start of the construction project, which is scheduled to occur in April 2004. The end of the contemporaneous period is when the project will begin normal operation, which is planned for January 2006.

Honda of America Mfg., Inc.

Facility ID: 0180000130

PTI Application: 01-08782

Issued: To be entered upon final issuance

Table of HAM Facility VOC Emission Increases in the Five Year Period

Plant	Source ID	PTI #	Source Description	Date of PTI	Years of Actual Emissions	Avg 2 Yr Actual Emissions (TPY)	Net Emissions Increase (TPY)
ELP	K015	05-10278	BPA - coating	12/22/99	1997, 1998	161.41	26.6
ELP	P020	05-10278	BPA - polish	12/22/99	1997, 1998	2.65	0.86
ELP	P021	05-10278	BPA - misc solvents	12/22/99	1997, 1998	1.23	11.62
ELP	P022	05-10278	BPA - paint mix	12/22/99	1997, 1998	2.65	0.86
ELP	P015	05-10359	Dynomometer	04/26/00	1998, 1999	1.24	5.24
ELP	B007	05-10022	FAC air handler	05/19/99	-	0	0.25
ELP	NA	de minimis	New ELP silo	-	-	0	1.83
ELP	K024	05-12466	PA melt sheet	06/02	-	0	28.7
MMP	K404	01-5456	Line 4 paint line	12/18/01	1998, 1999*	46.0	39.9
MMP	K401	01-8584	Line 1 paint line	08/27/02	1998, 1999*	14.75	39.65
MAP	P004, P330	01-8118	Line 1/Line 2 weld	06/07/00	1998, 1999	7.9	3.11
MAP	P005, P200	01-8541	WE sealer	07/09/02	2000, 2001	5.42	12.58
MAP	K007	01-8341	Final repair/burners	05/03/01	1999, 2000	2.93	3.43
MAP	R205	01-8376	IP painting/burners	11/20/01	-	0	14.17
MAP	K227, K228	01-8502	Black out	11/29/01	-	0	10.0
MAP	B064	01-8413	FA-AH-43	07/17/01	1999, 2000	0.15	0.20
MAP	R200-R204	01-8167	POPA burners	10/23/01	1998, 1999	0	0.79
MAP	P340, P301	01-8167	POPA sludge pits	12/23/01	1998, 1999*	3.99	6.24

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MAP	P330, P334, P335, P336, P318, P319, P332, P333	01-8010	MHI 5, 6, 7, 8, 11, HPM 9,10, 4 - Injection molding	12/22/99	1998, 1999	1.07	17.19
MAP	B024	exempt	4.72 MMBtu/hr	1999	-	0	0.11
MAP	Z123	exempt	7.15 MMBtu/hr	2001	-	0	0.17
MAP	Z127	exempt	7.15 MMBtu/hr	2001	-	0	0.17
MAP	Z128	exempt	7.15 MMBtu/hr	2001	-	0	0.17
MAP	Z132	exempt	4.86 MMBtu/hr	2001	-	0	0.12
MAP	Z130	exempt	4.86 MMBtu/hr	2001	-	0	0.12
MAP	Z133	exempt	4.86 MMBtu/hr	2001	-	0	0.12
MAP	Z330	exempt	4.5 MMBtu/hr	2002	-	0	0.11
MAP	Z331	exempt	4.5 MMBtu/hr	2002	-	0	0.11
TOTAL NET VOC EMISSIONS INCREASE							224.42

* The two year average of actual emissions are based on the years most representative of "normal operations". All other two year averages of actual emissions are based on the previous two consecutive years. "Normal operations" for each emissions unit identified is defined by Honda in an addendum to the PTI application submitted to the Ohio EPA, Central District Office October 8, 2003.

Table of HAM Facility VOC Emission Reductions in the Five Year Period

Plant	Source ID	PTI #	Source Description	Date of Shutdown	Years of Actual Emissions	Avg 2 Yr Actual Emissions (TPY)	Net Emissions Decrease (TPY)
ELP	K010	-	Black wax	09/00	1998, 1999	33.82	-33.82
MAP	R200- R204	01-8167	POPA - modification	10/23/01*	1998, 1999	186.27	-79.27
MAP	K214	01-6743	Black wax	7/01-1/02	1999, 2000	88.05	-88.05

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MAP	R013- R015, P013, P015	01-512	OBL	01/02*	1998, 1999	56.58	-56.58
MAP	K001	01-6380	Civic pad machine	mid 2000	1998, 1999	34.74	-34.74
MAP	P310, P311, P316, P317	01-5659	Injection machines	2001	2000, 2001	0.86	-0.86
MAP	P304	01-6648, 01-8282	OBL sludge pits	12/01	2000, 2001	1.09	-1.09
TOTAL VOC EMISSIONS DECREASE							-294.41

* The two year average of actual emissions are based on the years most representative of "normal operations". All other two year averages of actual emissions are based on the previous two consecutive years. "Normal operations" for each emissions unit is defined by Honda in an addendum to the PTI application submitted to the Ohio EPA, Central District Office October 8, 2003.

**Table of VOC Emissions Reductions from the Shutdown of the
Existing Paint Line 2 Emissions Units at MAP**

Source ID	PTI #	Source Description	Proposed Year of Shutdown	Years of Actual Emissions	Avg 2 Yr Actual Emissions (TPY)	Net Emissions Decrease (TPY)
K002	01-6743	Line 2 e-coat	2006	2001, 2002	16.08	-16.08
K003	01-6743	Line 2 primer/surfacer	2006	2001, 2002	153.93	-153.93
K004	01-6743	Line 2 topcoat	2006	2001, 2002	372.38	-372.38
R002	01-6743	Line 2 sealer/deadener	2006	2001, 2002	15.67	-15.67
K232, K233	01-8658	Line 1 and 2 polish	2006	2001, 2002	0.36	-0.36
P306		Sludge pits	2006	2001, 2002	0.42	-0.42
TOTAL VOC EMISSIONS DECREASE						-558.84

**Summary Table of All VOC Reductions and Increases Considered as a Part of the
New Line 2 Construction and Total Net Emissions Change**

Summary of Changes	Net Emissions Change (TPY)
Five year emissions increases	+224.42
Five year emissions decreases	-294.41
Shutdown of existing Paint Line 2	-558.84
New Line 2 Emissions	+517.9
Total Emissions Change	-110.93
PSD Significant Emissions Level	40

The permittee shall notify the Ohio EPA, Central District Office upon initiation of production in New Line 2 and upon completion of production in the existing Line 2.

2. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the U.S. EPA, 40 CFR Part 60:

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation</u>
K235	New Line 2 e-Coat	MM
K236	New Line 2 primer/surfacer	MM
K237	New Line 2 topcoat	MM

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Air Quality Modeling and Planning
 P.O. Box 1049
 Columbus, OH 43216-1049

and

Central District Office

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Division of Air Pollution Control
3232 Alum Creek Drive
Columbus, OH 43207-3417

3. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR Part 63, Subpart III upon promulgation of the final standard. On December 24, 2002, the U.S. EPA published the proposed Subpart III but as of the date of the issuance of this permit, the final has not been promulgated. This new standard will apply to the Honda of America Mfg., Inc. (Honda) facility and the emissions units included in this permit.

U.S. EPA failed to promulgate these standards by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. Therefore, in accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.40 through 63.44), the permittee is subject to a case-by-case MACT determination (Section 112(g) of the Clean Air Act) for the emissions units included in this permit. Honda has requested in the permit to install application (received by the Ohio EPA, Central District Office August 20, 2003) that the 112(g) determination be equivalent to the proposed Subpart III MACT standard. Ohio EPA accepted this determination as appropriate and the emission units included in this permit shall be subject to the proposed Subpart III MACT standard.

4. Upon the startup of emissions units K235, K236, K237, and K238 included in this permit, the permittee shall be in compliance with all of the limitations, work practice standards, monitoring, record keeping, reporting, and testing as specified in the proposed Subpart III standard, published December 24, 2002, including the following limitations and notification requirements.

a. Emission Limitations:

- i. Emissions from the combined electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations shall not exceed 0.50 lb organic HAP/gallon of coating solids deposited, based on a monthly average. This limit applies because the emissions from the bake ovens used to cure the electrodeposition (e-coat) primers are captured and ducted to a control device having a control efficiency of at least 95%.
- ii. Emissions from the adhesives and sealers (other than glass bond adhesives) shall not exceed 0.010 lb HAP/lb of material used, based on a monthly average.
- iii. Emissions from deadener operations shall not exceed 0.010 lb HAP/lb of material used, based on a monthly average.

b. Notification Requirements:

- i. The permittee must submit an Initial Notification as specified by 40 CFR Part 63.9(b) no later than 120 days after initial startup.

- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

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

1. The permit to install for the emissions units included in this permit were evaluated based on actual materials (typically coatings and cleanup materials) and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 96,660

Maximum Hourly Emission Rate (lbs/hr): 3.01 (assumes 1% maximum concentration by weight)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24.44

MAGLC (ug/m3): 2,301

Pollutant: methyl isobutyl ketone

TLV (ug/m3): 204,830

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 4,877

Pollutant: n-butyl acetate

TLV (ug/m3): 712,640

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 16,968

Pollutant: xylene

TLV (ug/m3): 434,190

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 10,338

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Pollutant: toluene

TLV (u/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 4,486

Pollutant: diacetone alcohol

TLV (ug/m3): 237,550

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 5,656

Pollutant: 2-butoxyethyl acetate

TLV (ug/m3): 131,040

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 3,120

Pollutant: n-butyl alcohol

TLV (ug/m3): 60,630

Maximum Hourly Emission Rate (lbs/hr): 30.01 (assumes 10% maximum concentration by weight)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 244.42

MAGLC (ug/m3): 1,444

Pollutant: isopropanol

TLV (ug/m3): 491,530

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 11,703

Pollutant: ethyl benzene

TLV (ug/m3): 434,190

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 10,338

Pollutant: i-butyl alcohol

TLV (ug/m3): 151,570

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 3,609

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Pollutant: formaldehyde

TLV (ug/m3): 370

Maximum Hourly Emission Rate (lbs/hr): 1.13 (assumes a maximum the following maximum concentrations by weight: 1% for primer/surfacer, 0.1% for basecoat, 0.06% for sludge)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8.62

MAGLC (ug/m3): 8.8

Pollutant: methyl ethyl ketone

TLV (ug/m3): 589,780

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 14,042

Pollutant: n-propyl alcohol

TLV (ug/m3): 491,530

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 11,703

Pollutant: isobutyl acetate

TLV (ug/m3): 712,640

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 16,968

Pollutant: methanol

TLV (ug/m3): 262,090

Maximum Hourly Emission Rate (lbs/hr): 300.68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,444.2

MAGLC (ug/m3): 6,240

Pollutant: naphthalene

TLV (ug/m3): 52,430

Maximum Hourly Emission Rate (lbs/hr): 6.62 (assumes 2.2% maximum concentration by weight)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 53.77

MAGLC (ug/m3): 1,248

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The above Air Toxics Policy requirements will no longer be applicable to the emissions units contained within this permit if the facility becomes subject to a MACT standard and demonstrates compliance with all applicable requirements. The Air Toxics Policy will remain applicable to all emissions units the MACT standard does not apply.

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>
K235 - New Line 2 e-coat including electrodeposition booth and oven	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 0.28 lb/gallon of applied solids (gas), as a daily volume weighted average. VOC emissions from the coating operations shall not exceed 24.36 tons/yr. Emissions from natural gas usage in emissions units K235 through K238 shall not exceed: 0.82 lb PE/hr; 0.10 lb SO ₂ /hr; 0.4 ton SO ₂ /yr; 43.23 lbs NO _x /hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09(C)(1)(c), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 60 - Subpart MM. See Sections A.I.2.a, 2.b, 2.c, and 2.i below.
	OAC rule 3745-31-05(C)	See Sections A.I.2.g, A.I.2.h, A.II.1 and A.II.2 below.
	OAC rule 3745-21-09(C)(1)(a)	

NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.4 lbs/gallon of deposited solids, as a daily volume weighted average.
OAC rule 3745-21-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-23-06(B)	VOC emissions shall not exceed 0.17 kg/liter of applied coating solids, as a monthly volume weighted average from the e-coat operation.
OAC rule 3745-31-28	See Section A.I.2.d below.
	See Section A.I.2.e below.
	See Section A.2.j below.

2. Additional Terms and Conditions

- 2.a** The e-coat operation consists of an e-coat booth with electrodeposition tank, rinse tanks, and oven. The VOC emissions from the e-coat oven are controlled by a regenerative thermal oxidizer (RTO).
- 2.b** The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
- 2.c** The overall control efficiency of the e-coat operation shall be equal or greater than 65 percent, by weight where,

$$\text{overall control efficiency} = (\text{destruction removal efficiency of RTO}) \times (\text{e-coat oven capture efficiency})$$

- 2.d** The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a 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 "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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- 2.e** The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- 2.f** VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- 2.g** The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.
- 2.h** All cleanup and purge materials associated with this emissions unit are permitted under PTI 01-6743, issued on December 24, 1997.
- 2.i** The hourly natural gas emission limitations and annual SO2 natural gas limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- 2.j** This emissions unit is subject to the MACT 112(g) determination specified in Part II.3 and 4 of the Facility Specific Terms and Conditions for this permit.

II. Operational Restrictions

- 1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

- 2. The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (cubic feet)</u>
1	100,000,000
1-2	200,000,000
1-3	300,000,000
1-4	400,000,000
1-5	500,000,000
1-6	600,000,000
1-7	700,000,000
1-8	794,652,000
1-9	794,652,000
1-10	794,652,000
1-11	794,652,000
1-12	794,652,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the usage rates.

- 3. The average combustion temperature within the RTO, 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 is in compliance.
- 4. The permittee shall operate the RTO whenever coating is applied in this emissions unit.
- 5. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO 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 monitors and recorders

shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature 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 the emission unit is in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when coating was applied in this emissions unit.
2. The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the VOC emission rate, in kg/liter (as monthly volume weighted average) in order to demonstrate compliance with the following emission limitation: 0.17 kg/liter of applied coating solids, as a monthly weighted average

The monitoring, record keeping and calculations shall be performed in accordance with NSPS 40 CFR 60, Subpart MM.

3. The permittee shall collect and maintain the following records on a daily basis for the purpose of determining compliance with the VOC emission limitations of 0.28 lb/gas, as a daily volume weighted average and 1.4 lbs/gas, as a daily volume weighted average:
- a. the name and identification of each coating employed;
 - b. the mass of VOC per gallon of coating solids of each coating, as applied;
 - c. the volume solids content of each coating, as applied;
 - d. the number of gallons of each coating employed, in gallons;
 - e. the daily volume weighted average VOC content of all coatings, as applied, in lbs/gas; and
 - f. the calculated, controlled VOC emission rate, as applied, in lbs/gas.

The permittee shall also maintain the following records on an annual basis for the purpose of determining the annual VOC emissions:

- a. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - b. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section A.I.V.1.d.
4. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2 emissions units K235-K239 and P342-P344:

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- a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
5. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2 emissions units K235-K239 and P341:
- a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material from uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.
6. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2 emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
- a. the total combined natural gas usage rate for the New Line 2 emission units, in cubic feet/month;
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period. Also, during the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/rolling, 12-month period.
7. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in A.II.3 above;
 - b. all records showing an exceedance of the controlled VOC emission limitation of 0.17 kg/liter of applied solids, as a monthly volume-weighted average;
 - c. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;
 - d. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production;
 - e. all monthly records showing an exceedance of the total emissions from natural gas usage in New Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr;
 - f. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for New Line 2 of 794,652,000 cubic feet and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage; and
 - g. all records showing that the RTO was not in service when the emissions unit was in operation.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing showing an exceedance of the controlled VOC emission limitation of 0.28 lb/gas, as a daily volume-weighted average and/or 1.4 lb/gas, as a daily volume weighted average. Each report, including a copy of such record, shall be submitted within 45 days after the exceedance occurs.

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:

0.28 lb VOC/gas, as a daily volume weighted average, from coating operations

1.4 lb VOC/gas, as a daily volume weighted average, from coating operations

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.3 above.

b. Emission Limitation:

0.17 kg/liter of applied solids, as a monthly volume weighted average, from coating operations

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.2 above.

c. Emission Limitation:

24.36 tons VOC/year from coating operations

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.3 above.

d. Emission Limitations:

Emissions from natural gas from emissions units K235-K238 combined.

0.82 lb PE/hr;

0.10 lb SO₂/hr; 0.4 ton SO₂/yr;

43.23 lbs NO_x/hr;

36.31 lbs CO/hr;

2.38 lbs VOC/hr

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The annual SO₂ limit was determined by multiplying hourly emission rate by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Methods 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

e. **Emission Limitation:**

The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.

The overall control efficiency of the e-coat operation shall be equal or greater than 65 percent, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted 3 months after installation and salable production startup;
- ii. The emission testing shall be conducted to determine the destruction efficiency of the RTO. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The destruction efficiency (i.e., the percent reduction in mass emissions between inlet and outlet of the RTO) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based

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on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- f. **Emission Limitation:**
515.7 tons VOC/rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.5 above.

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Emissions Unit ID: K235

- g. Emission Limitations:
The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 ton PE/PM10/yr
39.73 ton NOx/yr
33.38 ton CO/yr.

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

- h. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.4 above.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

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>
K235 - New Line 2 e-coat including electrodeposition booth and oven	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
K236 - New Line 2 primer/surfacer including two auto zones, flash off zones, and ovens	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 9.5 lb/gallon of applied solids (gas), as a daily volume weighted average when employing solventborne coatings and 5.5 lb/gas, as a daily volume weighted average when employing waterborne coatings.</p> <p>VOC emissions from the coating operations shall not exceed 225.10 tons/yr.</p> <p>Particulate emissions (PE) from coating overspray shall not exceed 2.40 lbs/hr. This emission limitation is equivalent to the requirements of OAC rule 3745-17-11(B)(1), based on Table I.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE/hr; 0.10 lb SO₂/hr; 0.4 ton SO₂/yr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A)(1),</p>

	3745-21-09(C)(1)(c), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 60 - Subpart MM. See Sections A.I.2.a, 2.b, 2.c, and 2.i below.
OAC rule 3745-31-05(C)	PE from emissions units K236, K237 and P342-P344 shall not exceed 9.8 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Sections A.I.2.f, A.I.2.g, A.II.1 and A.II.2 below.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 15.1 lbs/gallon of deposited solids, as a daily volume weighted average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section A.I.2.j below.
NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 kg/liter of applied coating solids, as a monthly volume weighted average from the primer/surfacer coating operation.
OAC rule 3745-21-08(B)	See Section A.I.2.d below.
OAC rule 3745-23-06(B)	See Section A.I.2.e below.
OAC rule 3745-31-28	See Section A.I.2.k below

2. Additional Terms and Conditions

- 2.a** The primer/surfacer coating operation consists of two lines, each including an auto zone booth, flash off zone, oven and cooling area. The VOC emissions from the two ovens are controlled by a regenerative thermal oxidizer (RTO).
- 2.b** The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
- 2.c** The overall control efficiency of the primer/surfacer operation shall be equal or greater than 9 percent, by weight, where,
- overall control efficiency = (destruction removal efficiency of RTO) x (primer surfacer oven capture efficiencies)
- 2.d** The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.
- On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a 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 "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- 2.e** The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- 2.f** VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- 2.g** The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.
- 2.h** All cleanup and purge materials associated with this emissions unit are permitted under PTI 01-6743, issued on December 24, 1997.
- 2.i** The hourly natural gas emission limitations, annual SO₂ natural gas limitation, and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- 2.j** The primer/surfacer operation is regulated as a "topcoat" in accordance with the definition found in OAC rule 3745-21-01(C)(58). The definition states "topcoat means

one or more surface coatings, excluding final repair, which are applied after prime coat for desired aesthetic effects." The primer/surfacer is applied after the prime coat operation which is identified as emissions unit K235 of this permit.

- 2.k** This emissions unit is subject to the MACT 112(g) determination specified in Part II.3 and 4 of the Facility Specific Terms and Conditions for this permit.

II. Operational Restrictions

- 1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

- 2. The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (cubic feet)</u>
1	100,000,000
1-2	200,000,000
1-3	300,000,000
1-4	400,000,000
1-5	500,000,000
1-6	600,000,000
1-7	700,000,000
1-8	794,652,000
1-9	794,652,000
1-10	794,652,000
1-11	794,652,000
1-12	794,652,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the usage rates.

3. The average combustion temperature within the RTO, 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 is in compliance.
4. The permittee shall operate the RTO and fabric filter control system whenever spray coating is being applied in this emissions unit.
5. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO 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 monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature 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 the emission unit is in compliance; and

- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain records that document any time periods when the fabric filter control system was not in service when spray coating was being applied in this emissions unit.
3. The permittee shall maintain records for the primer/surfacer operation that will enable the permittee to calculate the VOC emission rate, in lbs/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 9.5 lb/gas for all solventborne coatings applied, as a daily volume weighted average, 5.5 lb/gas for all waterborne coatings applied, as a daily volume weighted average and 1.40 kg/liter of applied coating solids, as a monthly weighted average

The monitoring, record keeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof to determine daily volume weighted average or in accordance with NSPS 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the primer/surfacer operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

4. The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed;
 - d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section A.I.V.1.f.
5. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured

at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.

6. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.

7. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions from coating overspray and sanding in the New Line 2 emission units combined, in tons PE/month using the facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/rolling, 12-month period.

8. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
 - a. the total combined natural gas usage rate for the New Line 2 emission units, in cubic feet/month;
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period. Also, during the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NOx, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/month; and

- d. the total rolling, 12-month summation of VOC, PE/PM10, NOx, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/rolling, 12-month period.
9. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in A.II.3 above;
 - b. all records showing an exceedance of the controlled VOC emission rate of 9.5 lbs/gas, as a daily volume-weighted average for solventborne coatings applied and/or 5.5 lbs/gas, as a daily volume weighted average for waterborne coatings applied;
 - c. all records showing an exceedance of the controlled VOC emission rate of 1.40 kgs/liter of applied solid, as a monthly volume-weighted average;
 - d. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;
 - e. all monthly records showing a calculated PE emissions exceedance of the New Line 2 emission limitation of 9.8 tons/rolling, 12-month period;
 - f. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production;
 - g. all monthly records showing an exceedance of the total emissions from natural gas usage in New Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr;
 - h. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for New Line 2 of 794,652,000 cubic feet and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage; and
 - i. all records showing that the RTO and/or fabric filter control system were not in service when spray coating was applied in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit annual reports by April 15th which specify the total VOC and PE emissions from this emissions unit. These report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
3. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitations:
9.5 lb VOC/gas for solventborne coatings, as a daily volume weighted average and 5.5 lb VOC/gas for waterborne coatings
1.40 Kg/liter of applied solids, as a monthly volume weighted average, from coating operations

Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.3 above.
 - b. Emission Limitation:
225.1 tons VOC/year from coating operations

Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.4 above.
 - c. Emission Limitation:
2.4 lbs PE/hr from coating overspray

Applicable Compliance Method:
Compliance with this limit shall be based on meeting the requirements for the fabric filter control system found in Sections A.II.4, A.III.2, and A.IV.1.i above. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
 - d. Emission Limitations:
Emissions from natural gas from emissions units K235-K238 combined:
0.82 lb PE/hr;
0.10 lb SO₂/hr; 0.4 ton SO₂/yr;
43.23 lbs NO_x/hr;
36.31 lbs CO/hr;
2.38 lb VOC/hr

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The annual SO₂ limit was determined by multiplying hourly emission rate by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Methods 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

e. **Emission Limitation:**

9.8 tons PE/rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.7 above.

f. **Emission Limitation:**

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.

The overall control efficiency of the primer/surfacer operation shall be equal or greater than 9 percent, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted 3 months after installation and salable production startup;
- ii. The emission testing shall be conducted to determine the destruction efficiency of the RTO. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

- (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The destruction efficiency (i.e., the percent reduction in mass emissions between inlet and outlet of the RTO shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative method in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- g. Emission Limitation:
515.7 tons VOC/ rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.6 above.

- h. The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 ton PE/PM10/yr
39.73 ton NOx/yr
33.38 ton CO/yr.

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

- i. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

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).

- j. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: K236

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.5 above.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

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>
K236 - New Line 2 primer/surfacer including two auto zones, flash off zones, and ovens	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
K237 - New line 2 topcoat including two basecoat and topcoat applications, spot primer and repair areas, and curing oven	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) content of the coatings employed in this emissions unit shall not exceed 8.0 lb/gallon of applied solids (gas), as a daily volume weighted average.</p> <p>VOC emissions from the coating operations shall not exceed 196.3 tons/yr.</p> <p>Particulate emissions (PE) from coating overspray shall not exceed 2.40 lbs/hr. This emission limitation is equivalent to the requirements of OAC rule 3745-17-11(B)(1), based on Table I.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE/hr; 0.10 lb SO₂/hr; 0.4 ton SO₂/yr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-07(A)(1), 3745-21-09(C)(1)(c), 3745-21-08(B), 3745-23-06(B), and 40 CFR Part 60 - Subpart MM.</p>

OAC rule 3745-31-05(C)	<p>See Sections A.I.2.a, 2.b, 2.c, and 2.j below.</p> <p>PE from emissions units K236, K237 and P342-P344 shall not exceed 9.8 tons per rolling, 12-month period, excluding emissions from natural gas usage.</p>
OAC rule 3745-17-07(A)(1)	<p>See Sections A.I.2.g, A.I.2.h, A.II.1 and A.II.2 below.</p> <p>Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.</p>
OAC rule 3745-17-11(B)(1)	<p>The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
OAC rule 3745-21-09(C)(1)(c)	<p>VOC emissions shall not exceed 15.1 lbs/gallon of deposited solids, as a daily volume weighted average.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
NSPS - 40 CFR Part 60, Subpart MM	<p>VOC emissions shall not exceed 1.47 kg/liter of applied coating solids, as a monthly volume weighted average from the topcoat operation.</p>
OAC rule 3745-21-08(B)	<p>See Section A.I.2.e below.</p>
OAC rule 3745-23-06(B)	<p>See Section A.I.2.f below.</p>
OAC rule 3745-31-28	<p>See Section A.I.2.k below.</p>

2. Additional Terms and Conditions

- 2.a** The topcoat coating operation consists of two lines, each including a basecoat area with a heated flashoff and a clearcoat area followed by a topcoat curing oven. The VOC emissions from the two topcoat curing ovens and two clearcoat booth auto zones are controlled by a regenerative thermal oxidizer (RTO). The clearcoat booth auto zones are controlled by a VOC concentrator.

- 2.b** The RTO controlling the topcoat curing ovens, clearcoat VOC concentrator and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
- 2.c** The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight.
- 2.d** The overall control efficiency of the topcoat operation shall be equal or greater than 58 percent, by weight, where,
- overall control efficiency = (clear coat booth auto zone capture) x (VOC removal efficiency of the concentrator) x (destruction removal efficiency of RTO) + (topcoat oven capture efficiencies) x (destruction removal efficiency of RTO)
- 2.e** The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.
- On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a 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 "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- 2.f** The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.
- 2.g** VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- 2.h** The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.
- 2.i** All cleanup and purge materials associated with this emissions unit are permitted under PTI 01-6743, issued on December 24, 1997.
- 2.j** The hourly natural gas emission limitations, annual SO2 natural gas limitation, and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.

2.k This emissions unit is subject to the MACT 112(g) determination specified in Part II.3 and 4 of the Facility Specific Terms and Conditions for this permit.

II. Operational Restrictions

- 1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

- 2. The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (cubic feet)</u>
1	100,000,000
1-2	200,000,000
1-3	300,000,000
1-4	400,000,000
1-5	500,000,000
1-6	600,000,000
1-7	700,000,000
1-8	794,652,000
1-9	794,652,000
1-10	794,652,000
1-11	794,652,000
1-12	794,652,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the usage rates.

3. The average combustion temperature within the RTO, 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 is in compliance.
4. The permittee shall operate the underbooth scrubber and RTO whenever spray coating is being applied in this emissions unit.
5. The permittee shall operate a VOC concentrator for the clearcoat operations whenever spray coating is being applied in this emissions unit. This VOC concentrator shall have the following:
 - a. an initial stationary layer of carbon;
 - b. a rotating adsorbent carbon wheel;
 - c. an operating desorption fan; and
 - d. a standard desorption temperature range between 200 and 260 degrees Fahrenheit until a specific range is established during the testing required in Section A.I.V.1.f below.
6. The average gas temperature of the desorption concentrate stream of the VOC concentrator, for any 3-hour block of time when the emissions unit is in operation, shall not fall below the limit established during testing as required in Section A.I.V.1.f below.

7. The average pressure drop of the dilute stream of the VOC concentrator, for any 3-hour block of time when the emissions unit is in operation, shall not fall below the limit established during testing as required in Section A.I.V.1.f below.
8. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO 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 monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, 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 the emission unit is in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the gas temperature of the desorption concentrate stream of the VOC concentrator 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 monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day: all 3-hour blocks of time during which the average desorption concentrate stream temperature, when the emissions unit was in operation, was less than the average temperature established during the most recent emission test that demonstrated the emission unit is in compliance.

3. The permittee shall operate and maintain equipment which continuously monitors and records the pressure drop of the dilute stream across the VOC concentrator when the emissions unit is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and complete a minimum of one cycle of operation for each successive 15-minute period. There must be minimum of four equally spaced successive cycles of operation in one hour.

The permittee shall install a device to monitor pressure drop across the rotary carbon bed of the VOC concentrator that meets the following requirements:

- a. The pressure sensor(s) shall be located in a position that provides a representative measurement of the pressure;
- b. Pulsating pressure, vibration, and internal and external corrosion shall be minimized or eliminated;
- c. Use of a gauge with a minimum tolerance of 0.5 inch of water or a transducer with a minimum tolerance of 1 percent of the pressure range;
- d. The pressure tap shall be checked daily;
- e. Calibration checks shall be conducted anytime the sensor exceeds the manufacturer's specified maximum operating pressure range or a new pressure sensor shall be installed; and
- f. Inspection of components for integrity, electrical connections for continuity, and mechanical connections for leakage shall be conducted at least monthly.

The permittee shall have available necessary parts for routine repairs of the monitoring equipment maintained at all times. The permittee shall also record the results of each inspection, calibration, and validation check.

The permittee shall collect and record the following information for each day: all 3-hour blocks of time during which the average pressure drop of the dilute stream, when the emissions unit was in operation, was less than the average pressure drop established during the most recent emission test that demonstrated the emission unit is in compliance.

4. The permittee shall maintain records that document any time periods when the underbooth scrubber, and/or VOC concentrator were not in service when spray coating was being applied in this emissions unit.
5. The permittee shall maintain records for the topcoat process that will enable the permittee to calculate the VOC emission rate, in lbs/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 8.0 lb/gas for all coatings, as a daily volume weighted average and 1.47 Kg/liter of applied coating solids, as a monthly weighted average

The monitoring, record keeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof to determine daily volume weighted average or in accordance with NSPS 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

6. The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed;
 - d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section A.I.V.1.f.

7. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.

8. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.

9. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K236, K237 and P342-P344:
 - a. the total summation of controlled PE emissions from coating overspray and sanding in the New Line 2 emission units combined, in tons PE/month using the facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/rolling, 12-month period.
10. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
 - a. the total combined natural gas usage rate for the New Line 2 emission units, in cubic feet/month; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period. Also, during the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period.
 - c. the total summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/rolling, 12-month period.
11. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in A.II.3 above;
 - b. all 3-hour blocks of time during which the average gas temperature of the desorption concentrate stream of the VOC concentrator did not comply with the temperature limit specified in A.II.6 above;

- c. all 3-hour blocks of time during which the average pressure drop of the dilute stream across the VOC concentrator did not comply with the limit specified in A.II.7 above;
- d. all records showing an exceedance of the controlled VOC emission rate of 8.0 lbs/gas, as a daily volume-weighted average;
- e. all records showing an exceedance of the controlled VOC emission rate of 1.47 kgs/liter of applied solid, as a monthly volume-weighted average;
- f. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;
- g. all monthly records showing a calculated PE emissions exceedance of the New Line 2 emission limitation of 9.8 tons/rolling, 12-month period;
- h. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production;
- i. all monthly records showing an exceedance of the total emissions from natural gas usage in New Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr;
- j. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for New Line 2 of 794,652,000 cubic feet and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage; and
- k. all records showing that the underbooth scrubber, VOC concentrator and/or the RTO were not in service when the emissions unit was in operation.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

- 2. The permittee shall submit annual reports by April 15th which specify the total VOC and PE emissions from this emissions unit. These report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
- 3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitations:
8.0 lb VOC/gas, as a daily volume weighted average, from coating operations
1.47 Kg/liter of applied solids, as a monthly volume weighted average, from coating operations
- Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.5 above.
- b. Emission Limitation:
196.3 tons VOC/year from coating operations
- Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.6 above.
- c. Emission Limitation:
2.40 lbs PE/hr from coating overspray
- Applicable Compliance Method:
Compliance with this limit shall be based on meeting the requirements for the underbooth scrubber control system found in Sections A.II.4, A.III.4, and A.IV.1.k. above. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
- d. Emission Limitations:
Emissions from natural gas from emissions units K235-K238 combined:
0.82 lb PE/hr;
0.10 lb SO₂/hr; 0.4 ton SO₂/yr;
43.23 lbs NO_x/hr;
36.31 lbs CO/hr;
2.38 lbs VOC/hr
- Applicable Compliance Method:
These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The annual SO₂ limit was determined by multiplying hourly emission rate by 8760 hours per year and divided by 2000 pounds per ton.
- If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method

5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitation:
9.8 tons PE/rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.9 above.

- f. Emission Limitation:
The RTO controlling the topcoat curing ovens, clearcoat VOC concentrator and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight.
The overall control efficiency of the topcoat operation shall be equal or greater than 58 percent, by weight.

Applicable Compliance Method:
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted within 3 months after salable production of vehicles;
- ii. the emission testing shall be conducted to determine the destruction efficiency of the RTO and removal efficiency of the concentrator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. the following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - a. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - b. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - c. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - d. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

- e. Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The destruction removal efficiency (i.e., the percent reduction in mass emissions between inlet and outlet of the RTO and/or concentrator) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative method in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office.

- iv. the following operating parameters for the VOC concentrator must be established during the test:
 - a. the desorption concentrate stream temperature shall be monitored and recorded at least once every 15 minutes during each of the three runs of the performance test;
 - b. the data collected during the test shall be used to calculate and record the average temperature which shall be the minimum operating limit for the desorption concentrate gas stream temperature;
 - c. the pressure drop of the dilute stream across the concentrator shall be monitored and recorded at least once every 15 minutes during each of the three runs of the performance test; and
 - d. the data collected during the test shall be used to calculate and record the average pressure drop which shall be the maximum operating limit for the dilute stream across the concentrator.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- g. Emission Limitation:
515.7 tons VOC/ rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:
Compliance may be determined by the record keeping specified in Section III.8 above.

- h. Emission Limitations:
The natural gas usage from emission units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 ton PE/PM10/yr
39.73 ton NOx/yr
33.38 ton CO/yr.

Applicable Compliance Method:
These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

- i. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: K237

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).

- j. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.7 above.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: K237

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>
K237 - New line 2 topcoat including two basecoat and topcoat applications, spot primer and repair areas, and curing oven	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
K238 - New Line 2 sealer/deadener operation including application of sealer, deadener, and liquid-applied sound deadener (LASD) and sealer oven	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) content of the sealer/deadener employed in this emissions unit shall not exceed 0.30 lb/gallon.</p> <p>The VOC content of the liquid applied sound deadener (LASD) employed in this emissions unit shall not exceed 0.75 lb/gallon.</p> <p>VOC emissions from the sealer/deadener and LASD operations combined shall not exceed 57.31 tons/yr.</p> <p>Emissions from natural gas usage in emissions units K235 through K238 shall not exceed:</p> <p>0.82 lb PE/hr; 0.10 lb SO₂/hr; 0.4 ton SO₂/yr; 43.23 lbs NO_x/hr; 36.31 lbs CO/hr; and 2.38 lbs VOC/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-21-09(U), 3745-21-08(B), and 3745-23-06(B).</p>
		See Sections A.I.2.a, 2.b, 2.c, and 2.i below.

OAC rule 3745-31-05(C)	See Sections A.I.2.f and 2.g below.
OAC rule 3745-21-09(U)	VOC emissions shall not exceed 3.0 lbs/gallon, excluding water and exempt solvent materials. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See Section A.I.2.d below.
OAC rule 3745-23-06(B)	See Section A.I.2.e below.
OAC rule 3745-31-28	See Section A.I.2.k below.

2. Additional Terms and Conditions

- 2.a** The sealer/deadener coating operation consists of sealer application, deadener application, LASD application, and sealer oven. The VOC emissions from the sealer oven are controlled by a regenerative thermal oxidizer (RTO).
- 2.b** The RTO controlling the sealer oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
- 2.c** The overall control efficiency of the sealer/deadener and LASD operations shall be equal or greater than 85 percent, by weight, where,

overall control efficiency = (destruction removal efficiency of RTO) x (sealer oven capture efficiency)
- 2.d** The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a 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 "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.

- 2.f** VOC emissions from vehicle production for emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- 2.g** The natural gas usage for emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period: 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr.
- 2.h** All cleanup and purge materials associated with this emissions unit are permitted under PTI 01-6743, issued on December 24, 1997.
- 2.i** The hourly natural gas emission limitations and annual SO2 natural gas limitation are based on potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are needed to establish compliance with these limitations.
- 2.j** The 0.30 lb VOC/gallon emission limitation for sealer/deadener and the 0.75 lb VOC/gallon for LASD materials specified under OAC rule 3745-31-05(A)(3) is based upon the use of compliant coatings as denoted in OAC rule 3745-21-09(B)(3)(f).
- 2.k** This emissions unit is subject to the MACT 112(g) determination specified in Part II.3 and 4 of the Facility Specific Terms and Conditions for this permit.

II. Operational Restrictions

- 1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The natural gas usage for emissions units K235-K238 shall not exceed 794,652,000 cubic feet per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (cubic feet)</u>
1	100,000,000
1-2	200,000,000
1-3	300,000,000
1-4	400,000,000
1-5	500,000,000
1-6	600,000,000
1-7	700,000,000
1-8	794,652,000
1-9	794,652,000
1-10	794,652,000
1-11	794,652,000
1-12	794,652,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the usage rates.

3. The average combustion temperature within the RTO, 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 is in compliance.
4. The permittee shall operate the RTO whenever coating is being applied in this emissions unit.
5. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO 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 monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the RTO, 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 the emission unit is in compliance; and
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when coating is being applied in this emissions unit.
2. The permittee shall collect and record the following information each month for the sealer/deadener and LASD applications:
 - a. the name and identification of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon.
 3. The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in lbs/gallon;
 - d. the total uncontrolled annual VOC emission rate in lbs or tons VOC/year; and
 - e. the total controlled annual VOC emission rate in lbs or tons VOC/year, based on the control efficiency determined through the testing required in Section A.I.V.1.d.
 4. This facility shall maintain records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:

- a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
5. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P341:
- a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.
6. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K238 for the purpose of determining compliance with the natural gas usage and emission limitations:
- a. the total combined natural gas usage rate for the New Line 2 emission units, in cubic feet/month;
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period. Also, during the first 12 calendar months of operation following the installation of the emission units, the total natural gas usage rate, in cubic feet per rolling 12-month period;
 - c. the total summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/month; and
 - d. the total rolling, 12-month summation of VOC, PE/PM10, NO_x, and CO emissions from natural gas usage in the New Line 2 emission units combined, in tons/rolling, 12-month period.
7. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in A.II.3 above;
 - b. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;
 - c. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production;
 - d. all monthly records showing an exceedance of the total emissions from natural gas usage in New Line 2 emissions units of 2.2 tons VOC/yr, 3.02 tons PE/PM10/yr, 39.73 tons NOx/yr, and 33.38 tons CO/yr;
 - e. all monthly records showing an exceedance of the 12-month, rolling natural gas usage limitation for New Line 2 of 794,652,000 cubic feet and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage; and
 - f. all records showing that the RTO was not in service when coating was applied in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
3. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the VOC emission rates of 0.30 lb/gal for sealer/deadener materials or 0.75 lb/gal for LASD materials or 3.0 lbs/gallon, excluding water and exempt solvents materials. Each report, including a copy of such record, shall be submitted within 30 days after the exceedance occurs.

V. Testing Requirements

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

a. Emission Limitations:

0.30 lb VOC/gal for sealer/deadener materials and 0.75 lb VOC/gal for LASD materials
3.0 lbs/gallon, excluding water and exempt solvent materials.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.2 above.

b. Emission Limitation:

57.31 tons VOC/yr from the sealer/deadener and LASD

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.3 above.

c. Emission Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

0.82 lb PE/hr;
0.10 lb SO₂/hr; 0.4 ton SO₂/yr;
43.23 lbs NO_x/hr;
36.31 lbs CO/hr;
2.38 lb VOC/hr

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The annual SO₂ limit was determined by multiplying hourly emission rate by 8760 hours per year and divided by 2000 pounds per ton.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.

The overall control efficiency of the primer/surfacer operation shall be equal or greater than 85 percent, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted 3 months after installation and salable production startup;
- ii. The emission testing shall be conducted to determine the destruction efficiency of the RTO. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:
 - (a) Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - (b) Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - (c) Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - (d) Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - (e) Methods 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A (for VOC emissions).

The destruction efficiency (i.e., the percent reduction in mass emissions between inlet and outlet of the RTO shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative method in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA, Central District Office will consider the request, including an

evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office.

- iv. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- e. **Emission Limitation:**
515.7 tons VOC/ rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:
Compliance may be determined by the record keeping specified in Section III.5 above.

- f. The natural gas usage from emissions units K235-K238 shall not exceed the following emissions limits based upon a rolling, 12-month period:

2.2 tons VOC/yr
3.02 ton PE/PM10/yr
39.73 ton NOx/yr
33.38 ton CO/yr.

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: K238

Applicable Compliance Method:

These limits represent the maximum emissions generated by burning natural gas if the rolling, 12-month usage restriction of 794,652,000 cubic feet is maintained. These emission limitations were determined by multiplying the maximum natural gas usage by the emission factors for each pollutant (lbs of pollutant/MM ft³) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

g. Emission Limitation:

275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.4 above.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

VI. Miscellaneous Requirements

None

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: K238

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>
K238 - New Line 2 sealer/deadener operation including application of sealer, deadener, and liquid-applied sound deadener (LASD) and sealer oven	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
K239 - Existing Line 1 and New Line 2 polish operations	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the polish operations shall not exceed 4.8 lbs/gallon, excluding water and exempt solvents.</p> <p>VOC emissions from the polish operations shall not exceed 2.1 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	See Sections A.I.2.c and A.II.1&2.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.b.

2. Additional Terms and Conditions

- 2.a The polish operations consists of polish application in the repair line, main line, and topcoat inspection areas in the existing Line 1 and New Line 2 coating lines. VOC emissions from the polish operations are not controlled.
- 2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), only materials exempt per OAC rule 3745-21-07(G)(9) or non-photochemically reactive materials shall be applied in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.c VOC emissions from vehicle production for New Line 2 emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.
- 2.d All cleanup and purge materials associated with this emissions unit are permitted under PTI 01-6743, issued on December 24, 1997.
- 2.e The 4.8 lbs VOC/gallon emission limitation specified under OAC rule 3745-31-05(A)(3) is based upon the use of only compliant polishing materials as denoted in the submitted air netting permit application.

II. Operational Restrictions

- 1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

- 2. The total number of units (vehicles) processed through the existing Line 1 emissions units K002, K003, K004, R002, and R003 shall not exceed 245,000 units per rolling, 12-month period. To ensure enforceability during the first twelve calendar months of operation, following the issuance of this permit, existing vehicle records from the previous calendar months of operation shall be used to calculate the rolling, 12-month emissions.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each polish material;
 - b. the VOC content of each polish material, in pounds per gallon, excluding water and exempt solvents; and
 - c. documentation on whether or not each polish material employed in this emissions unit is photochemically reactive.
2. The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each polish material employed;
 - b. the number of gallons of each polish material employed;
 - c. the VOC content of each polish material employed; and
 - d. the total annual OC emission rate in lbs or tons VOC/year.
3. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:
 - a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
4. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and

- b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.
5. The permittee shall maintain the following records, as of the last day of each calendar month, for existing Line 1, emissions units K002, K003, K004, R002, and R003:
 - a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. the total rolling, 12-month production rate, in units (vehicles), measured at the AF off) area.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;
 - b. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production;
 - c. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for existing Line 1 of 245,000 vehicles; and
 - d. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9), including an identification of the material used and the day(s) and duration of time the material was used.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing the use of a polish material that exceeds 4.8 lbs VOC/gallon, excluding water and exempt solvents. Each report, including a copy of such record, shall be submitted within 30 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
4.8 lbs VOC/gallon excluding water and exempt solvents

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.1 above.

- b. Emission Limitation:
2.1 tons VOC/year from coating operations

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.2 above.

- c. Emission Limitation:
515.7 tons VOC/ rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.4 above.

- d. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.3 above.

- e. Emission Limitation:
245,000 vehicles processed through existing Line 1 emissions units K002, K003, K004, R002, and R003 per rolling, 12-month period

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.5 above.

- 2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

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>
K239 - Existing Line 1 and New Line 2 polish operations	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
P341 - New Line 2 sludge pit operations	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the water treatment materials added to the sludge pits shall not exceed 1.44 lbs/gallon, excluding water and exempt solvents, as a monthly volume weighted average.</p> <p>VOC emissions from the sludge pit operations shall not exceed 10.57 tons/yr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	See Sections A.I.2.c and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	See Section A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The New Line 2 sludge pit operations consist of addition of water treatment materials that contain VOC to the sludge pits associated with coating activities in New Line 2. VOC emissions from the sludge pit operations are not controlled.
- 2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), only materials exempt per OAC rule 3745-21-07(G)(9) or non-photochemically reactive materials shall be applied in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- 2.c VOC emissions from vehicle production for New Line 2 emissions units K235-K239 and P341 shall not exceed 515.7 tons per rolling, 12-month period, excluding emissions from natural gas usage.

II. Operational Restrictions

- 1. The total amount of VOC-containing water treatment materials added to the New Line 2 sludge pits shall not exceed 13,950 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the New Line 2 emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Usage Rate (gallons)</u>
1	3,000
1-2	4,000
1-3	5,000
1-4	6,000
1-5	7,000
1-6	8,000
1-7	9,000
1-8	10,000
1-9	11,000
1-10	12,000
1-11	13,950
1-12	13,950

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual water treatment material usage rate limitation shall be based upon a rolling, 12-month summation of the usage rates.

III. Monitoring and/or Record keeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each water treatment material employed in the sludge pits;
 - b. the VOC content of each water treatment material employed in the sludge pits, in pounds per gallon; and
 - c. documentation on whether or not each water treatment material employed in this emissions unit is photochemically reactive.

2. The permittee shall collect and maintain the following records for the purpose of determining compliance with the annual VOC emission limitation for this emissions unit:
 - a. the name and identification of each water treatment material employed in the sludge pits;
 - b. the number of gallons of each water treatment material employed;
 - c. the VOC content of each water treatment material employed; and
 - d. the total annual OC emission rate in lbs or tons VOC/year.
3. The permittee shall maintain the following records, as of the last day of each calendar month, for P341:
 - a. beginning after the first 12 calendar months of operation following the installation of this emissions unit, the total combined gallons of water treatment material employed in the sludge pits. Also, during the first 12 calendar months of operation following the installation of this emissions unit, the total rolling, 12-month water treatment usage, in gallons; and
 - b. the total rolling, 12-month water treatment material usage, in gallons.
4. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P341:
 - a. the total summation of controlled (K235-K238) and uncontrolled (K239, P341) VOC emissions from the materials employed in the New Line 2 emission units combined, in tons VOC/month (summation of gallons of material x VOC content of material reduced by the control efficiencies of the control equipment as determined by testing required in Section A.I.V.1.d for controlled units) + (summation of gallons of material x VOC content of material for uncontrolled units); and
 - b. the total rolling, 12-month summation of controlled and uncontrolled VOC emissions for the materials employed in the New Line 2 emission units combined, in tons VOC/rolling, 12-month period.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all records showing an exceedance of the VOC emission rate of 1.44 lbs/gal, excluding water and exempt solvents, as a monthly volume weighted average;
 - b. all monthly records showing a calculated VOC emissions exceedance of the New Line 2 emission limitation of 515.7 tons/rolling 12-month period;

- c. all monthly records showing an exceedance of the 12-month, rolling water treatment material usage rate of 13,950 gallons and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage; and
- d. any occurrence of the use of photochemically reactive material or materials not exempted in 3745-21-07(G)(9), including an identification of the material used and the day(s) and duration of time the material was used.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

- 2. The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of 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 Limitations:
1.44 lb VOC/gal, excluding water and exempt solvents

Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.1 above.
 - b. Emission Limitation:
10.57 tons VOC/year

Applicable Compliance Method:
Compliance may be determined by the record keeping requirements specified in Section III.2 above.
 - c. Emission Limitation:
515.7 tons VOC/rolling, 12-month period from vehicle production for emissions units K235-K239 and P341, excluding emissions from natural gas usage.

Applicable Compliance Method:
Compliance may be determined by the record keeping specified in Section III.4 above.
 - d. Emission Limitation:
The total amount of VOC-containing water treatment materials added to the New Line 2 sludge pits shall not exceed 13,950 gallons per rolling, 12-month period.

Honda of America Mfg., Inc.

PTI Application: 01-08782

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Facility ID: 0180000130

Emissions Unit ID: P341

Applicable Compliance Method:

Compliance may be determined by the record keeping specified in Section III.3 above.

2. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the VOC containing materials employed in this emissions unit.

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>
P341 - New Line 2 sludge pit operations	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
P342 - New Line 2 e-coat sanding operations controlled by fabric filters	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.02 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(C).
	OAC rule 3745-31-05(C)	PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.8 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Section A.II.1 below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.
- 2.b The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

$$(\# \text{ of units produced}) \times (\text{average volume of sanding}) \times (\text{density of particulate}) \text{ where,}$$

units = recorded per Part II.A.; and

average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

2. The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
3. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:

- a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emissions units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
4. The permittee shall maintain records, as of the last day of each calendar month, for the New Line 2, emissions units K236, K237 and P342-P344:
- a. the total summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/rolling, 12-month period.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the New Line 2 emission limitation of 9.8 tons/rolling, 12-month period;
 - b. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production; and
 - c. all records showing that the fabric filter control system were not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

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

- a. Emission Limitation:
PE from the sanding operations shall not exceed 0.02 lbs/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on information submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (control efficiency of fabric filter control)

where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

maximum quantity of units sanded = 80 per hour

control efficiency of fabric filter = 98% (assumes 100% capture)

- b. Emission Limitation:
9.8 tons PE/rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.4 above.

- c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

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).

- d. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: P342

Compliance may be determined by the record keeping specified in Section III.3 above.

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>
P342 - New Line 2 e-coat sanding operations	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
P343 - New Line 2 surfacer sanding operations controlled by fabric filters	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.05 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(C).
	OAC rule 3745-31-05(C)	PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.8 tons per rolling, 12-month period, excluding emissions from natural gas usage. See Section A.II.1. below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.
- 2.b The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation

II. Operational Restrictions

1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) where,

units = recorded per Part II.A.; and

average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

2. The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
3. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:

- a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emissions units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
4. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K236, K237 and P342-P344:
- a. the total summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/rolling, 12-month period.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the New Line 2 emission limitation of 9.8 tons/rolling, 12-month period;
 - b. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production; and
 - c. all records showing that the fabric filter control system were not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

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

- a. Emission Limitation:
PE from the sanding operations shall not exceed 0.05 lbs/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on information submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (control efficiency of fabric filter control)

where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003

maximum quantity of units sanded = 80 per hour

control efficiency of fabric filter = 98% (assumes 100% capture)

- b. Emission Limitation:
9.8 tons PE/rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.4 above.

- c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

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).

- d. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: P343

Compliance may be determined by the record keeping specified in Section III.3 above.

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>
P343 - New Line 2 surfacer sanding operations controlled by fabric filters	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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>
P344 - New Line 2 repair sanding operations controlled by fabric filters	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the sanding operations shall not exceed 0.12 lb/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-05(C).</p>
	OAC rule 3745-31-05(C)	<p>PE from emissions units K236, K237 and P342 through P344 shall not exceed 9.8 tons per rolling, 12-month period, excluding emissions from natural gas usage.</p> <p>See Section A.II.1 below.</p>
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The permittee shall vent particulate emissions from the sanding operations to the fabric filters controlling this emissions unit.
- 2.b The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, record keeping and reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The total number of units (vehicles) processed through the New Line 2 emissions units K235-K239 and P342-P344 shall not exceed 275,000 units per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the installation of the emissions units, the permittee shall not exceed the levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Production Rate (vehicles)</u>
1	75,000
1-2	100,000
1-3	125,000
1-4	150,000
1-5	175,000
1-6	200,000
1-7	225,000
1-8	250,000
1-9	275,000
1-10	275,000
1-11	275,000
1-12	275,000

After the first 12 calendar months of operation following the installation of the emissions units, compliance with the annual vehicle production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

2. The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) where,

units = recorded per Part II.A.; and

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003

2. The permittee shall maintain daily records that document any time periods when the fabric filter control was not in operation when sanding operations occurred in this emissions unit.
3. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K235-K239 and P342-P344:

- a. the total combined production rate, in units (vehicles)/month, measured at the "Assembly off area (AF off)"; and
 - b. beginning after the first 12 calendar months of operation following the installation of the emission units, the total rolling, 12-month production rate, in units (vehicles), measured at the AF off area. Also, during the first 12 calendar months of operation following the installation of the emissions units, the total rolling, 12-month production rate in units (vehicles), measured at the AF off area.
4. The permittee shall maintain the following records, as of the last day of each calendar month, for New Line 2, emissions units K236, K237 and P342-P344:
- a. the total summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/month; and
 - b. the total rolling, 12-month summation of controlled PE emissions in the New Line 2 emission units combined, in tons PE/rolling, 12-month period.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated PE emission exceedance of the New Line 2 emission limitation of 9.8 tons/rolling, 12-month period;
 - b. all monthly records showing an exceedance of the 12-month, rolling vehicle production limitation for New Line 2 of 275,000 vehicles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative vehicle production; and
 - c. all records showing that the fabric filter control system were not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.

2. The permittee shall submit an annual report by April 15th which specifies the total PE emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

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

- a. Emission Limitation:
PE from the sanding operations shall not exceed 0.12 lbs/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on information submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (control efficiency of fabric filter control)

where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003

maximum quantity of units sanded = 80 per hour

control efficiency of fabric filter = 98% (assumes 100% capture)

- b. Emission Limitation:
9.8 tons PE/rolling, 12-month period from emissions units K236, K237 and P342-P344 combined.

Applicable Compliance Method:

Compliance may be determined by the record keeping requirements specified in Section III.4 above.

- c. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average.

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).

- d. Emission Limitation:
275,000 vehicles processed through the New Line 2 emissions units K235-K239 and P342-P344 per rolling, 12-month period

Applicable Compliance Method:

Honda of America Mfg., Inc.

PTI Application: 01-08782

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: P344

Compliance may be determined by the record keeping specified in Section III.3 above.

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>
P344 - New Line 2 repair sanding operations controlled by fabric filters	None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None