☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **No. 01-06642**
Honda of America Manufacturing Inc.

A. Source Description

Honda of America, 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. This permit modification, for a coating line, has been submitted by Honda's Marysville Motorcycle Plant (Honda) in order to add the emissions from the combustion of natural gas from the drying ovens associated with this source. This emissions unit, K403, was previously permitted in PTI 01-493 issued on 12/15/82 and then again under PTI #01-2675 issued 9/19/90.

B. Facility Emissions and Attainment Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons of OC/VOC (organic compounds/volatile organic compounds) per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. Honda has requested that this permit be issued as a Synthetic Minor with federally enforceable limits on OC/VOC emissions. The limits for this source are under PSD significant levels for OC/VOC, nitrogen oxides (NOx), particulate matter (PM), sulfur dioxide (SO2), and carbon monoxide (CO).

C. Source Emissions

On 2/21/95 Honda submitted a permit modification for this coating source to add the emissions from the combustion of natural gas from the drying ovens associated with this emissions unit. Honda has proposed federally enforceable permit restrictions on emissions of OC in the amount of 81.7 tons per rolling 12-months. In this application Honda has requested that the hourly limit of 81.6 pounds of VOC per hour be dropped and the restriction on gallons of coating per year be removed (as was required in PTI #01-2675), retaining instead a short term limit on the VOC content of all coatings applied in the unit, of no more than 6.5 pounds of VOC per gallon of any coating applied. Except for these two restrictions, and a monthly VOC limit (replaced by the rolling 12-month limit), all of the requirements that were contained in PTI #01-2675 have been maintained. Therefore, this permit application only includes the additional emissions from three small drying ovens, using a total of 6,000 ft^3 of natural gas per hour, together. This includes 2.63 ton of NOx and 2.21 tons of CO per year.

Facility emission limits for all of the coating booths located at the Honda motorcycle plant, including K403, have been carried over in this PTI from PTI #01-493, issued 12/15/82. These limits include a daily average VOC content limit (lbs/gal) for the prime and top coatings applied in all four coating booths together; as well as, a limit on the annual average

VOC content (lbs/gal) of all coatings employed in the four booths; and a limit of 296.4 tons of VOC per year from all four motorcycle coating booths together.

D. Conclusion

Honda has requested that this permit for a motorcycle coating booth be issued as a Synthetic Minor with federally enforceable permit restrictions on OC/VOC emissions of 81.7 tons of OC, calculated using material usage and cleanup recovery on a rolling 12-month basis. The permitted emissions from this source shall include the natural gas combustion in three small drying ovens serving this emissions unit, which includes 0.05 tons of filterable PM, 2.63 tons of NOx, 2.21 tons of CO, and 0.15 tons of VOC per rolling 12-months. Best Available Technology (BAT) for source K403 shall be the use of a thermal incinerator with 9% control efficiency and the use of a water curtain for control of particulate emissions. When photochemically reactive materials are applied, Honda shall comply with the 8 pounds per hour and 40 pounds per day OC limits contained in OAC rule 3745-21-07(G)(2).

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: 01-06642

CERTIFIED MAIL

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

DATE: 2/13/2001

Honda of America Manufacturing, Inc.
Cory Sander
24000 Honda Parkway
Marysville, OH 43040-9251

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 of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA **CDO**

DRAFT PERMIT TO INSTALL 01-06642

Application Number:	01-06642
APS Premise Number:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Manufacturing, Inc.
Person to Contact:	Cory Sander
Address:	24000 Honda Parkway Marysville, OH 43040-9251

Location of proposed air contaminant source(s) [emissions unit(s)]:
24000 Honda Pkwy
Marysville, Ohio

Description of proposed emissions unit(s):
Paint Line #3, motorcycle, K403.

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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.11 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 <u>obtained before</u> 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 thirty (30) 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.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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. 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.

5. 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.

6. Construction of New Sources(s)

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

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

7. 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.

8. Applicability

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

9. 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.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	81.7

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K403 - Paint Line # 3 Motorcycle - metal and plastic parts **(Modification)**	OAC rule 3745-31-05(A)(3)	The VOC content of any coating employed in K403 shall not exceed 6.5 pounds of OC/gallon. Particulate emissions from overspray shall not exceed 2.41 tons/yr. Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed: 0.60 lb NOx/hr; 2.63 tons NOx/yr; 0.50 lb CO/hr; 2.21 tons CO/yr; 0.01 lb PM/hr; 0.05 ton PM/yr; 0.03 lb OC/hr; and 0.15 ton OC/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(D).
	OAC rule 3745-31-05(D)	OC emissions shall not exceed 81.7 tons per rolling 12-months. Coating and cleanup material usage shall not exceed 45,000 gallons per rolling 12 months.

OAC rule 3745-31-05(A)(3), Facility PTI #01-493	MMP coating lines K401, K402, K403, and K404 together shall not exceed 296.4 tons of VOC per year. The average daily VOC content of the prime coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 7.6 pounds of VOC per gallon. The average daily VOC content of the top coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 6.5 pounds of VOC per gallon. The average annual VOC content of all coatings employed in the coating lines K401, K402, K403, and K404 shall not exceed 6.12 pounds of VOC per gallon.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.
OAC rule 3745-21-07(G)(2)	On any day when employing photochemically reactive materials to non-metal parts, emissions shall not exceed 8 lbs/hr and 40 lbs/day organic compounds for the coatings and photochemically reactive cleanup materials used for the non-metal parts.
OAC rule 3745-21-09(U)(1)	None, Honda Motorcycle exempt pursuant to OAC rule 3745-21-09(U)(2)(i), when coating motorcycles.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of no less that 90%. Until testing is conducted as required in

Section A.V.10, the amount of OC emissions entering the bake oven shall be estimated to be 10% of the total uncontrolled emissions.

2.b Net gallons and OC emissions may be calculated using the difference between materials (coating and cleanup) used, minus materials collected for off-site recovery, recycle, and/or disposal. A composite sample of each shipment of recovered materials, including any combination of coating, cleanup, and purge, shall be collected and tested (on or off-site), using USEPA Method 24, to determine the volatile content. The OC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents. If Line 3's coatings, reducing solvents, purge, and cleanup materials are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered materials is used to show compliance with the 81.7 tons per rolling 12-month OC limit for K403 or the 296.4 ton per year facility limit for K401, K402, K403, and K404, the credit for the recovered material shall be calculated proportionately, according to this emissions unit's OC contribution to the shipment, and records of the recovered material shall be maintained as required in Section A.III.2. No OC credit shall be calculated using a volume or weight of recovered material greater than that which was added to the recovery container(s) from K403 during any month, nor a OC concentration greater than the testing result(s) or MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used in the emissions unit" (materials collected from other emission units) shall also not be included in the credit to these emissions and material use (gallons). A record shall be maintained of the date the recovery tank is emptied and recovered materials shipped. The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the same month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank.

II. Operational Restrictions

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time, shall not be less than 1200 degrees Fahrenheit and/or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal parts:

   a. the company identification for each coating and cleanup material employed, and documentation on the content of each material to show that it is either photochemically reactive, as defined in 3745-21-01(C), non-photochemically reactive, and/or exempt as per 3745-21-07(G)(9);

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. for each day during which a photochemically reactive material is employed to non-metal parts, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials applied to non-metal parts, in pounds per day;

e. for each day during which a photochemically reactive material is employed to non-metal parts, the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive material is employed to non-metal parts, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials applied to non-metal parts, i.e., (d)/(e), in pounds per hour (average).

2. The permittee shall collect and record the following information each month for the purpose of determining rolling 12-month emissions and coating usage for the coating operation:

a. the name and identification of all coatings and cleanup materials employed;

b. the OC content of all coatings and cleanup materials employed, in pounds per gallon;

c. the total number of gallons of each coating and cleanup material employed;

d. the calculated total organic compound emission rate for all coatings, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;

e. if a credit for recovered material is to be used, the total amount of purge and cleanup material collected and shipped for recycle/recovery and/or disposal at an outside facility, and the mass (lbs) of OC to be credited to the calculations of the emissions, to demonstrate compliance with the limit(s) in Section A.I.1, tested and calculated as per Section A.I.2.b;

f. the net OC emissions from all coatings and cleanup/purge material employed, in pounds or tons per month;

g. the rolling 12-month coating and cleanup material usage in this emissions unit; and

h. the rolling 12-month OC emissions from coatings and cleanup materials used in this emissions unit.

3. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

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

5. The permittee shall collect and record the following information each day for the control equipment:

   a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

   b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was less than 1200 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6. For each day when applying any prime coating exceeding 7.6 pounds of VOC per gallon on lines K401, K402, K403, and K404, the permittee shall collect and record the following information for the prime coatings applied in coating lines K401, K402, K403, and K404:

   a. the name and identification number of each prime coating applied;

   b. the VOC content of each prime coat applied;

   c. the number of gallons of each prime coating applied; and

   d. the average pounds of VOC per gallon of prime coating employed in emission units K401, K402, K403, and K404.

7. For each day when applying any top coating exceeding 6.5 pounds of VOC per gallon on lines K401, K402, K403, and K404, the permittee shall collect and record the following information for the top coatings applied in coating lines K401, K402, K403, and K404:

   a. the name and identification number of each top coating applied;

   b. the VOC content of each top coat applied;

   c. the number of gallons of each top coating applied; and

   d. the average pounds of VOC per gallon of top coating employed in emission units K401, K402, K403, and K404.

8. The permittee shall collect and record the following information at the end of each year for the purpose of determining average annual VOC content of all coatings applied in emission units K401, K402, K403, and K404:

a. the name and identification of any additional coatings other than the top and prime coatings employed;

b. the VOC content of each coating employed, in pounds per gallon or percent by weight;

c. the total number of gallons of each coating and pounds or tons of powder coating (in K402) employed;

d. a record of the powder coating density and the calculation of pounds or tons to gallons of powder coating (K402);

e. the total gallons of all coatings employed during the year and calculated total pounds or tons of the organic compound content; and

f. the average VOC per gallon of all coatings employed, in pounds per gallon.

9. The permittee shall collect and record the following information at the end of each month for the purpose of determining annual VOC emissions from emission units K401, K402, K403, and K404:

a. a record of each coating and cleanup material employed in emission units K401, K402, K403, and K404;

b. a record of the VOC content of each coating and cleanup material, in pounds per gallon and percent by weight powder coat;

c. a record of the number of gallons of each coating and cleanup material and pounds or tons of powder coating employed in emission units K401, K402, K403, and K404;

d. the total VOC emissions from all coatings and cleanup materials employed in emission units K401, K402, K403, and K404, prior to any credit for recovered materials, in tons;

e. a record of the total amount of VOC emissions (lbs or tons/yr) that may be applied as a credit for the materials shipped for recycle/recovery and/or disposal at an outside facility during the year, summed from the monthly records of the credit from each shipment and calculated as per Section A.I.2.b; and

f. the total net VOC emissions from all coatings and cleanup materials employed in emission units K401, K402, K403, and K404 in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

   b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify any daily record showing an exceedance of the average daily VOC content of prime and top coatings applied in emissions units K401, K402, K403, and K404. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 45 days after the exceedance occurs.

3. The permittee shall submit deviation (excursion) reports which identify any exceedance of the combined annual VOC limit for emission units K401, K402, K403, and K404, and/or annual average VOC content limit of the total coatings applied in emission units K401, K402, K403, and K404. These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

4. The permittee shall notify the Ohio EPA Central District Office in writing of any record showing that the water curtain was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

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

6. The permittee shall submit deviation (excursion) reports which identify any monthly record showing an exceedance of the rolling 12-month OC limit. These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

7 The permittee shall submit annual reports which specify total OC emissions from emission units K401, K402, K403, and K404 for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each of these emission units in the annual Fee Emission Report.

8. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the use of non-complying coatings, greater than 6.5 pounds of VOC per gallon. The notification shall include a copy of such record and shall be sent to the Ohio EPA Central District Office within 30 days following the end of the calendar month.

9. The permittee shall submit deviation (excursion) reports which identify any rolling 12-month record showing the total use of coatings to exceed 45,000 gallons. These deviation reports shall include any corrective actions taken, and shall be submitted as required in the General Terms and Conditions, Part 1, Section A.1.c.

V. Testing Requirements

1. Emission Limitation:

8 pounds per hour and 40 lbs OC/day when applying photochemically reactive materials to non-metal

Applicable Compliance Method

Compliance with the hourly and daily OC emission limit, when using photochemically reactive materials (PRM), shall be determined through daily recordkeeping of the coatings, and photochemically reactive purge and cleaning material usage, the organic compound content of each material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each of these material applied. Formulation data from the manufacturer or US EPA Method 24 shall be used to determine the organic compound content of the coatings, purge, and cleaning materials to be used in the calculation of emissions. Daily emissions shall be calculated by multiplying the OC content of coatings and PRM purge/cleanup materials used (lbs OC/gallon of material or % OC by weight) times each of the material's usage each day; these emissions shall be summed, for all materials used. Hourly emissions shall be calculated by multiplying the OC content of the coatings and PRM purge, and cleanup materials used (lbs OC/gallon of material) times each materials' maximum usage in any hour (gallons/hr). If the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours of operation. Calculations shall be documented as follows:

OC emissions/hr = [(OC/gal of coating) x (maximum coating usage in gal/hr)] + [(OC/gal of purge material) x (maximum purge material usage in gal/hr)] +[(OC/gal of cleanup material) x (maximum cleanup material usage in gal/hr)] or:

OC emissions/hr = [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of purge material) x (purge material usage in gal/day)] +[(OC/gal of cleanup material) x (cleanup material usage in gal/day)] x [1 day /hours of operation] and:

OC emissions/day = [(OC/gal of coating) x (coating usage in gal/day)] + [(OC/gal of purge material) x (purge material usage in gal/day)] + [(OC/gal of cleaning material) x (cleaning material usage in gal/day)]

2. Emission Limitation

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

Applicable Compliance Method

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

3.a Emission Limitation

0.551 pound particulate emissions/hr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the water wall control system found in Sections A.II.1, A.III.3, and A.IV.4 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

3.b Emission Limitation

2.41 tons particulate emissions/yr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the water wall control system specified under Sections A.II.1, A.III.3, and A.IV.4 of Part III and recordkeeping of the monthly usage of the coatings applied, and annual calculation of emissions.

4. Emission Limitation

296.4 tons VOC per year for emissions units K401, K402, K403, and K404

Applicable Compliance Method

Compliance with the annual VOC limit shall be determined through monthly recordkeeping of coating, purge, and cleanup material usage; the volatile organic compound content of each material, and the materials collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the total calculated VOC emissions. Formulation data from the manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

5. Emission Limitation

7.6 lbs VOC/gallon of prime coating as a daily average and
6.5 lbs VOC/gallon of top coating as a daily average from K401, K402, K403, and K404

Applicable Compliance Method

Compliance with these daily average coating VOC limits from K401, K402, K403, and K404 coating lines shall be determined through daily recordkeeping of prime and top coatings when using any prime coat with a VOC content greater than 7.6 pounds of VOC per gallon and/or any topcoat greater than 6.5 pounds of VOC per gallon. On any such day, records shall be maintained of each coating's usage, the volatile organic compound content of each coating used, and the calculated average VOC content per gallon of prime and top coatings applied in these emission units. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

6. Emission Limitation

6.12 lbs VOC/gallon as a annual average VOC content from all coatings applied in emissions units K401, K402, K403, and K404

Applicable Compliance Method

Compliance with this annual average VOC limit shall be determined through recordkeeping of coating usage in each emissions unit, the volatile organic compound content of each coating used, and the calculated average VOC content per gallon of all coatings applied in these emission units. Formulation data from the coating manufacturer or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

7. Emission Limitation

81.7 tons OC/rolling 12 months

Applicable Compliance Method

Compliance with this limit shall be determined through 12-month rolling recordkeeping of coating, purge, and cleanup material usage; the organic compound content of each material; and if a recovery credit is to be used, the materials collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the total calculated OC emissions. Formulation data from the material's manufacturers or USEPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions. Twelve month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months' emission calculations.

8. Emission Limitation

Emissions from natural gas usage in the drying ovens from this emissions unit shall not exceed:

0.60 lb NOx/hr;
2.63 tons NOx/yr;
0.50 lb CO/hr;
2.21 tons CO/yr;
0.01 lb PM/hr;
0.05 ton PM/yr;
0.03 lb OC/hr; and
0.15 ton OC/yr

Applicable Compliance Method

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from two drying ovens (6,000 ft3/hr) 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. These amounts were multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

9. Emission Limitation

6.5 lbs VOC/gallon for any coating applied in K403

Applicable Compliance Method

Compliance with this VOC limit shall be determined through recordkeeping of coating usage and the volatile organic compound content of each coating applied in K403. Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

10. Emission Limitation

10% collection efficiency
90% destruction efficiency

Compliance Method

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

a. the emission testing shall be conducted approximately 6 months after permit issuance, unless an alternative schedule is submitted and approved by the Ohio EPA Central District Office;

b. the emission testing shall be conducted to demonstrate compliance with the collection efficiency of 10% capture and destruction efficiency of 90%;

c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1 for sample and velocity traverses; Method 2 for velocity and volumetric flow rates; Methods 25 or 25A for destruction efficiency and for the VOC concentration at the source of the coating's application, and in the effluent gas entering and leaving the emission control device; and Methods 204A through F for capture efficiency. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; or, any Method of testing may be required/requested by the Administrator;

d. the tests 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.

VI. Miscellaneous Requirements

This PTI (#01-06642) supercedes and replaces the requirements for emissions unit K403 in PTI #01-2675 issued 9/19/90.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K403 - Paint Line # 3 Motorcycle - metal and plastic parts **(Modification)**	Ohio Air Toxics Policy	

2. Additional Terms and Conditions

2.a

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials applied and the design parameters of the emissions 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 this emissions unit using data from the permit to install application and the SCREEN 3.0 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: Silica, Amorphous

TLV: 3 mg/m^3

Maximum Hourly Emission Rate: 2.826 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 69 ug/m^3

MAGLC: 71.4 ug/m^3

Pollutant: Hexamethylene diisocyanate

TLV: 0.0344 mg/m^3

Maximum Hourly Emission Rate: 0.033 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.799 ug/m^3

MAGLC: 0.819 ug/m^3

Pollutant: Isopropanol

TLV: 983 mg/m^3

Maximum Hourly Emission Rate: 52.333 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 1,278 ug/m^3

MAGLC: 23,406 ug/m^3

Pollutant: Kaolin (Aluminum silicate)

TLV: 2 mg/m^3

Maximum Hourly Emission Rate: 1.936 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 47 ug/m^3

MAGLC: 47.6 ug/m^3

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

   a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 01-06642 Facility ID: 0180000130

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Paint Line #3, Motorcycle, K403 CITY/TWP Marysville

SIC CODE 3751 SCC CODE 4-02-016-21 EMISSIONS UNIT ID K403

EMISSIONS UNIT DESCRIPTION Paint Line # 3 Motorcycle - metal and plastic parts

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.551	2.41	0.551	2.41
PM_{10}					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0 w PRM	81.7	8 w PRM	81.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 01-06642 Facility ID: 0180000130

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Paint Line #3, Motorcycle, K403 CITY/TWP Marysville

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☐	0000000**c**.wpd	☒	
Modeling form/results	☐	0000000**s**.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b**.wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

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

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

Honda of America, 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. This permit modification, for a coating line, has been submitted by Honda's Marysville Motorcycle Plant (Honda) in order to add the emissions from the combustion of natural gas from the drying ovens associated with this source. This emissions unit, K403, was previously permitted in PTI 01-493 issued on 12/15/82 and then again under PTI #01-2675 issued 9/19/90.

B. Facility Emissions and Attainment Status

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons of OC/VOC (organic compounds/volatile organic compounds) per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. Honda has requested that this permit be issued as a Synthetic Minor with federally enforceable limits on OC/VOC emissions. The limits for this source are under PSD significant levels for OC/VOC, nitrogen oxides (NOx), particulate matter (PM), sulfur dioxide (SO2), and carbon monoxide (CO).

C. Source Emissions

NEW SOURCE REVIEW FORM B

PTI Number: 01-06642 Facility ID: 0180000130

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Paint Line #3, Motorcycle, K403 CITY/TWP Marysville

On 2/21/95 Honda submitted a permit modification for this coating source to add the emissions from the combustion of natural gas from the drying ovens associated with this emissions unit. Honda has proposed federally enforceable permit restrictions on emissions of OC in the amount of 81.7 tons per rolling 12-months. In this application Honda has requested that the hourly limit of 81.6 pounds of VOC per hour be dropped and the restriction on gallons of coating per year be removed (as was required in PTI #01-2675), retaining instead a short term limit on the VOC content of all coatings applied in the unit, of no more than 6.5 pounds of VOC per gallon of any coating applied. Except for these two restrictions, and a monthly VOC limit (replaced by the rolling 12-month limit), all of the requirements that were contained in PTI #01-2675 have been maintained. Therefore, this permit application only includes the additional emissions from three small drying ovens, using a total of 6,000 ft^3 of natural gas per hour, together. This includes 2.63 ton of NOx and 2.21 tons of CO per year.

Facility emission limits for all of the coating booths located at the Honda motorcycle plant, including K403, have been carried over in this PTI from PTI #01-493, issued 12/15/82. These limits include a daily average VOC content limit (lbs/gal) for the prime and top coatings applied in all four coating booths together; as well as, a limit on the annual average VOC content (lbs/gal) of all coatings employed in the four booths; and a limit of 296.4 tons of VOC per year from all four motorcycle coating booths together.

D. Conclusion

Honda has requested that this permit for a motorcycle coating booth be issued as a Synthetic Minor with federally enforceable permit restrictions on OC/VOC emissions of 81.7 tons of OC, calculated using material usage and cleanup recovery on a rolling 12-month basis. The permitted emissions from this source shall include the natural gas combustion in three small drying ovens serving this emissions unit, which includes 0.05 tons of filterable PM, 2.63 tons of NOx, 2.21 tons of CO, and 0.15 tons of VOC per rolling 12-months. Best Available Technology (BAT) for source K403 shall be the use of a thermal incinerator with 9% control efficiency and the use of a water curtain for control of particulate emissions. When photochemically reactive materials are applied, Honda shall comply with the 8 pounds per hour and 40 pounds per day OC limits contained in OAC rule 3745-21-07(G)(2).

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	81.7