

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

Permit To Install **05-12919**

A. Source Description

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

B. Facility Emissions and Attainment Status

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

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

C. Source Emissions

The emissions from the PED dynamometer test stands include particulate matter, oxides of nitrogen, carbon monoxide, volatile organic compounds, and sulfur dioxide. The emissions are limited by operational requirements for the thermal oxidizer controls and operational restrictions based upon rolling, 12-month summations. The unit is limited to 27,000 operating hours for all nine (9) test stands combined. In addition, only 400 of the 27,000 hours shall be used to test engines of a size greater than 3.9 liters and not exceeding 5.3 liters.

The restriction on operating hours and the operational requirements for the thermal oxidizers effectively limit emissions from the PED dynamometer test stands. As a result, emissions from this air contaminant source will not exceed 1.75 tons of particulate matter, 1.30 tons of sulfur dioxide, 14.72 tons of oxides of nitrogen, 12.02 tons of carbon monoxide, and 0.98 ton of volatile organic compounds.

D. Conclusion

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



State of Ohio Environmental Protection Agency

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

SHELBY COUNTY

Application No: 05-12919

Fac ID: 0575000174

DATE: 2/24/2005

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

CERTIFIED MAIL

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

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

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

Sincerely,

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

CC: USEPA

SWDO

IN

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-12919 FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America Mfg Inc**

On 2/24/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America Mfg Inc**, located at **12500 Meranda Rd, Anna, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-12919:

Engine testing dynamometer and EQ rotary test fire - Ch. 31 modification.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 05-12919

Application Number: 05-12919
Facility ID: 0575000174
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg Inc
Person to Contact: Paul Huwer
Address: 12500 MERANDA RD
ANNA, OH 45302-9699

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

Description of proposed emissions unit(s):
Engine testing dynamometer and EQ rotary test fire - Ch. 31 modification.

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| PE | 1.75 |
| SO2 | 1.30 |
| NOx | 14.72 |
| VOC | 0.98 |
| CO | 12.02 |

Honda of America Mfg Inc

PTI Application: 05-12919

Issued: To be entered upon final issuance

Facility ID: 0575000174

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|---|
| P006 - PED engine testing dynamometers with nine (9) test stands and two (2) thermal oxidizers. (Terms in this permit supercede those identified in PTI 05-7193 issued on 4/19/95.) | OAC rule 3745-31-05(A)(3) | Particulate emissions (PE) shall not exceed 1.15 pounds per hour. Sulfur dioxide (SO ₂) emissions shall not exceed 0.86 pound per hour. Nitrogen oxides (NO _x) emissions shall not exceed 3.36 pounds per hour. Volatile organic compounds (VOC) emissions shall not exceed 0.6 pound per hour. Carbon monoxide (CO) emissions shall not exceed 7.48 pounds per hour. See Section A.I.2.e below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). |
| | OAC rule 3745-31-05(C) | PE shall not exceed 1.75 tons per rolling, 12-month summation. SO ₂ emissions shall not exceed 1.30 tons SO ₂ per rolling, 12-month summation. NO _x emissions shall not exceed 14.72 tons per rolling, 12-month summation. |

| | |
|------------------------|---|
| | VOC emissions shall not exceed 0.98 ton per rolling, 12-month summation. |
| | CO emissions shall not exceed 12.02 tons per rolling, 12-month summation. |
| OAC rule 3745-17-07(A) | See Section A.I.2.a below. |
| OAC rule 3745-17-11 | See Section A.I.2.b below. |
| OAC rule 3745-21-08(B) | See Section A.I.2.c below. |
| OAC rule 3745-18-06(G) | See Section A.I.2.d below. |
| OAC rule 3745-21-07(B) | See Section A.I.2.c below. |
| OAC rule 3745-23-06(B) | See Section A.I.2.c below. |

2. Additional Terms and Conditions

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

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

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

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

available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
- 2.e** The pound per hour limitations and the rolling, 12-month NO_x limitation are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limits.

II. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerators, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The maximum annual operating hours for this emissions unit shall not exceed 27,000 hours. In addition, only 400 of the 27,000 hours shall be used to test engines of a size greater than 3.9 liters and not exceeding 5.3 liters. The operating hour restrictions are based upon a rolling, 12-month summation of the operating hours for all testing dynamometers combined.

The permittee has sufficient existing records to demonstrate compliance with these limits during the first 12-months following the issuance of this permit. Therefore it is not necessary to establish operating hour restriction for the first 12-months of operation.

- 3. The permittee shall employ only unleaded fuel when operating this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measure and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. This requirement is limited to the incinerator that is operating or both when both incinerators are operating. 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.

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 emissions unit was in compliance.

- 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 monthly records for this emissions unit of the following information:
 - a. the operating hours for all test stands combined;
 - b. the rolling, 12-month summation of the operating hours for all test stands combined;
 - c. the operating hours for testing engines of a size greater than 3.9 liters and not exceeding 5.3 liters for all test stands combined;
 - d. the rolling, 12-month summation of the operating hours for testing engines of a size greater than 3.9 liters and not exceeding 5.3 liters for all test stands combined;
3. For each day when the permittee burns a fuel other than unleaded fuel within this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports for this emissions unit that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
 - b. all exceedances of the rolling, 12-month operating hours limitation of 27,000 hours; and
 - c. all exceedances of the rolling, 12-month operating hours limitation of 400 hours for testing engines of a size greater than 3.9 liters and not exceeding 5.3 liters.
 - d. all exceedances of the rolling, 12-month emission limitations of 1.75 ton PE, 1.30 ton of SO₂, 0.98 tons of VOC, and 12.02 tons of CO (any exceedance of the hours of operation restrictions shall be an exceedance of the emission limitations.)

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

2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than unleaded fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the event occurs.

V. Testing Requirements

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

1. Emission Limitations:

1.15 lbs of PE/hr and 1.75 tons PE per rolling, 12-month summation

0.86 lb of SO₂/hr and 1.30 tons SO₂ per rolling, 12-month summation

Applicable Compliance Methods:

The hourly and annual PE and SO₂ emission limitations were established respectively as follows:

$$Er = [(U) \times (0.264 \text{ gal/liter}) \times (EF) \times (9 \text{ dyno stands})] + [(2) \times (2,500,000 \text{ Btu/hr}) \times (1 \text{ scf}/1020 \text{ Btu}) \times (EE)]$$

$$Ar = [(U) \times (0.264 \text{ gal/liter}) \times (EF) \times (26,600 \text{ hrs} + 400 \text{ hrs}) + (2) \times (2,500,000 \text{ Btu/hr}) \times (1 \text{ scf}/1020 \text{ Btu}) \times (EE) \times (8,760 \text{ hrs/yr}) / (2000 \text{ lbs/ton})$$

where,

Er = the maximum hourly emission rate

Ar = the annual emission rate based upon limited operating hours

U = the maximum gas usage rate of 120 liters/hour

EF = the emissions factor of 0.004 lb PE/gallon or 0.003 lb SO₂/gal, as applicable (Based on June 2001 emission test at HRA-O)

EE = the emission factor for natural gas combustion, 1.9 lbs PE/million scf or 0.6 lb SO₂/million scf., as applicable (from AP-42, Table 1.4-2, revised 7/98)

If required, compliance with the hourly PE and SO₂ emission limitations shall be demonstrated based on the results of emission testing conducted in accordance with Methods 5 and/or 6, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the rolling, 12-month emission limitations is demonstrated based upon the record keeping in Part III - Section A.III.2 of this permit. Any exceedance of the rolling, 12-month operating hour restrictions is also an exceedance of the annual PE and SO₂ emission limitations.

2. Emission Limitations:

0.6 lb VOC/hr and 0.98 tons VOC per rolling, 12-month summation

Applicable Compliance Methods:

The hourly and annual VOC emission limitations were established respectively as follows:

$$Er = [(U) \times (0.264 \text{ gal/liter}) \times (EF) \times (9 \text{ dyno stands}) \times (1 - DRE)] + [(2) \times (2,500,000 \text{ Btu/hr}) \times (1 \text{ scf}/1020 \text{ Btu}) \times (EE)]$$

$$Ar = [(U) \times (0.264 \text{ gal/liter}) \times (EF) \times (26,600 \text{ hrs} + 400 \text{ hrs}) \times (1 - DRE) + (2) \times (2,500,000 \text{ Btu/hr}) \times (1 \text{ scf}/1020 \text{ Btu}) \times (EE) \times (8,760 \text{ hrs/yr})] / (2000 \text{ lbs/ton})$$

where,

Er = the maximum hourly emission rate

Ar = the annual emission rate based upon limited operating hours

U = the maximum gas usage rate of 120 liters/hour

EF = the emissions factor of 0.2 lb VOC/gallon (Based on June 2001 emission test at HRA-O)

DRE = the destruction removal efficiency of the thermal oxidizer, 99% or 0.99

EE = the emission factor for natural gas combustion, 5.5 lbs VOC/million scf (from AP-42, Table 1.4-2, revised 7/98)

If required, compliance with the hourly VOC limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the rolling, 12-month emission limitation is demonstrated based upon the record keeping in Part III - Section A.III.2 of this permit. Any exceedance of the rolling, 12-month operating hour restrictions is also an exceedance of the annual VOC emission limitation.

3. Emission Limitations:

3.36 lbs NOx/hr and 14.72 tons NOx per rolling, 12-month summation

Applicable Compliance Methods:

The hourly NOx emission limitation was established as follows:

$$Er = (2)(Ef)(PV)$$

where,

Er = the maximum hourly emission rate

Ef = the emissions factor of 1.2 lb/hr per thermal oxidizer (Based on Honda Anna 11/01 emission test results for this emissions unit)

PV = Process variability increase of 40% or 1.4

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 7, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual NOx emissions limitation was established by multiplying the maximum hourly emission rate, 3.36 lbs/hr, by 8,760 hours per year, and then dividing the result by 2000 lbs per ton.

4. Emission Limitation

7.48 lbs CO/hr

Applicable Compliance Method:

The hourly CO emission limitation was established as follows:

First, determine the standard flow rate for each type of engine tested:

$$3.9 \text{ liter engines flow rate} = (0.5)(6300 \text{ rpm})(3.9 \text{ liters})(0.0353 \text{ cf/liter})(528 \text{ deg R}/1460 \text{ deg R})$$

$$= 156.8 \text{ scfm}$$

$$5.3 \text{ liter engines flow rate} = (0.5)(6300 \text{ rpm})(5.3 \text{ liters})(0.0353 \text{ cf/liter})(528 \text{ deg R}/1460 \text{ deg R})$$

$$= 213.13 \text{ scfm}$$

Second, determine the mass rate of emissions with a maximum CO concentration of 11%:

$$\text{CO emission rate} = (0.11)(28.01 \text{ lbs/lb-mol}) / 385.4 \text{ scf/lb-mol}$$

$$= 0.008 \text{ lb CO/scf}$$

Finally, determine hourly emissions rate with eight (8) dynamometers testing 3.9 liter engines, and one (1) dynamometer testing 5.3 liter engines:

$$C_e = [(8)(156.83 \text{ scf/min}) + (1)(213.13 \text{ scf/min})](0.008 \text{ lb CO/scf})(60 \text{ min/hr})(1 - \text{DRE}) + [(2)(2,500,000 \text{ Btu/hr})(1 \text{ scf}/1020 \text{ Btu})(\text{EF})]$$

where,

C_e = the maximum hourly CO emission rate

DRE = the destruction removal efficiency of the thermal oxidizers, 99%

EF = the emission factor for natural gas combustion, 84.0 lbs CO/million scf (from AP-42, Table 1.4-1, revised 7/98)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 10, as appropriate, of 40 CFR, Part 60, Appendix A.

5. Emission Limitation:
12.02 tons CO per rolling, 12-month summation

Applicable Compliance Method:

The annual CO emission limitation was established as follows:

$$C_a = [(26,600 \text{ hrs/yr})(156.83 \text{ scf/min}) + (400 \text{ hrs/yr})(213.13 \text{ scf/min})](0.008 \text{ lb CO/scf})(60 \text{ min/hr})(1 - \text{DRE})(1 \text{ ton}/2000 \text{ lbs}) + [(2)(2,500,000 \text{ Btu/hr})(1 \text{ scf}/1020 \text{ Btu})(\text{EF})(8760 \text{ hrs/yr})(1 \text{ ton}/2000 \text{ lbs})]$$

where,

C_a = the annual CO emission rate

DRE = the destruction removal efficiency of the thermal oxidizers, 99%

EF = the emission factor for natural gas combustion, 84.0 lbs CO/million scf (from AP-42, Table 1.4-1, revised 7/98)

Compliance with the rolling, 12-month emission limitation is demonstrated based upon the record keeping in Part III - Section A.III.2 of this permit. Any exceedance of the rolling, 12-month operating hour restrictions is also an exceedance of the annual CO emission limitation.

6. 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 within 6 months following the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance for allowable emissions limitations for CO and NOx. The testing shall be conducted separately for each thermal oxidizer.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) and control efficiency:

CO: Methods 1-4 and 10 of 40 CFR Part 60, Appendix A

NOx: Methods 1-4 and 7 or 7A of 40 CFR Part 60, Appendix A

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

- d. 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, Southwest 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, Southwest 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, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time

Honda of America Mfg Inc

PTI Application: 05-12919

Issued: To be entered upon final issuance

Facility ID: 0575000174

Emissions Unit ID: P006

for the submittal of the written report, where warranted, with prior approval from Ohio EPA,
Southwest District Office.

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> |
|---|--------------------------------------|--|
| P006 - PED engine testing dynamometers with nine (9) test stands and two (2) thermal oxidizers. (Terms in this permit supercede those identified in PTI 05-7193 issued on 4/19/95.) | None | None |

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirement

None