

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

Permit To Install **01-05165**

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 emissions unit consists of a small material test laboratory, in which coatings are tested prior to their application in the auto production facility. This permit was originally issued draft on 2/12/97. After this permit was issued draft, Honda decided they did not want a 10 gallon per day restriction when coating metal parts, and the daily recordkeeping requirements that accompanies this requirement. Instead, they have requested a short term limit of 4.6 pounds of VOC per gallon of coating, as a monthly volume-weighted average, when coating metal parts. They also requested a rolling 12-month coating usage restriction, along with the necessary recordkeeping to demonstrate compliance with a rolling 12-month emissions limit. This permit is being re-issued draft, in order to account for these differences.

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 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 with federally enforceable limits for rolling 12-month coating usage and organic compound (OC) emission limits in order to maintain limits below significant levels.

C. Source Emissions

Honda is proposing federally enforceable permit restrictions of 4,690 gallons of material use on a rolling-12 month basis. Recordkeeping requirements for each material's usage and records of the OC content of each coating and cleanup material, and the calculated emissions, shall demonstrate compliance with the rolling 12-month limits contained in this permit. This permit also restricts the volatile organic compound (VOC) content of coatings applied to metal parts to 4.6 lbs VOC/gallon of coating as a monthly volume-weighted average and prohibits the application of photochemically reactive coatings to non-metal parts.

D. Conclusion

Honda has requested that the Materials Test Lab PTI be issued as a Synthetic Minor with federally enforceable permit restrictions on the gallons of coating and cleanup material used on a rolling 12-month basis with a rolling 12-month OC limit. They have also requested a short term limit on the organic compound content of the coatings applied to metal parts, with additional restrictions on the use of only non-photochemically reactive materials on non-metals. The emission unit shall be limited to 4,690 gallons of coating and cleanup material in any rolling 12-month period, and a limit of 12.0 tons of organic compound emissions per rolling 12-months.



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: 01-05165**

CERTIFIED MAIL

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

DATE: 6/14/2001

Honda of America Manufacturing, Inc.
Cory Sander
24000 Honda Parkway
Marysville, OH 430409190

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-05165

Application Number: 01-05165

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 430409190

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

**24000 Honda Pkwy
Marysville, Ohio**

Description of proposed emissions unit(s):

Material test lab.

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.10 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 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 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.

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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	12.0
PE	0.58

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>
R016 - Materials Test Lab (MTL) coating operations with electric drying oven (<i>Modification</i>)	OAC rule 3745-31-05(A)(3)	The volatile organic compound content of coatings shall not exceed 4.6 lbs/gal as a monthly volume-weighted average when coating metal parts and components. Particulate emissions from overspray shall not exceed 0.58 ton/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1) 3745-21-07(G)(9), and 3745-31-05(D).
	OAC rule 3745-31-05(D)	Organic compound emissions shall not exceed 12.0 tons per rolling 12 months from the coating and cleanup operations. The net coating and cleanup material usage shall not exceed 4,690 net gallons per rolling 12 month (in any combination of waterborne or solvent borne coatings), see A.I.2.b.
	OAC rule 3745-21-07(G)(9)	Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9) when coating plastic parts; see Section A.I.2.c below.

OAC rule 3745-21-09 (U)(2)(f)(ii)	Best available technology has been established to be less stringent than or inconsistent with than the requirements in 3745-21-09(U)(1).
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from coating overspray shall not exceed 0.551 lb/hr.

2. Additional Terms and Conditions

2.a In order to test the spray applicator's effect, coatings being tested in MTL can be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of MTL test coatings in the Final Repair paint booth as part of the emissions calculated for this emissions unit (MTL).

2.b Net gallons and OC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. This may include any combination of waterborne and solvent borne coatings and cleanup materials. 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 OC 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 coatings, purge, and/or cleanup materials from the material test lab operations are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered material(s) is used to show compliance with the 12.0 tons of OC per year, material test lab limit, 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.1. No OC credit, to the material test lab emissions, shall be calculated using a volume or weight of recovered material greater than that which was added to the recovery container(s) from R016 operations during any month, nor an OC concentration greater than the recovered material's OC testing result(s) and MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used" in the material test lab operations (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 tanks are emptied

and recovered materials shipped off-site. 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 month the material is shipped off-site, in the 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(s).

- 2.c** This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9) when coating non-metal.

Prior to employing any photochemically reactive materials to non-metal, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA Central District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

II. Operational Restrictions

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month coating usage (gallons/rolling twelve-months) and OC emissions shall be calculated based upon the actual coating usage and OC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each coating and cleanup material employed, documentation on the chemical content of each, and the material(s) to which they were/are employed (metal or non-metal);
 - b. the OC content and the number of gallons (or part gallon) of each coating and cleanup material applied to non-metal parts (as applied);

- c. the VOC content and the number of gallons of each coating applied to metal parts;
 - d. the VOC content and number of gallons (or part gallon) of each cleanup material employed to metal parts;
 - e. the monthly volume-weighted average VOC content of all coatings applied to metal parts, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,i}$;
 - f. the calculated total organic compound emission rate for all coating, purge, and cleanup materials, in pound per month, prior to credit for recovered materials;
 - g. if a credit for recovered materials is to be used, the total amount of purge, cleanup material, and coating collected and shipped for recycle/recovery and/or disposal at an outside facility, and the mass of OC to be credited to the calculations of the coating operation's emissions, to demonstrate compliance with the limit in Section A.I.1, tested and calculated as per Section A.I.2.b;
 - h. if a credit for recovered materials is to be used, the net OC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month;
 - i. the total rolling 12-month net usage of coating and cleanup material in gallons (total gallon usage minus materials collected and shipped for recycle and/or disposal at outside facility during the month); and
 - j. the total rolling 12-month OC emissions from all coatings and cleanup materials, in tons.
2. 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.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any record showing the application of a photochemically reactive material to non-metal in this emission unit. 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.
2. 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 using a spray coating application. 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.

3. The permittee shall notify the Ohio EPA Central District Office, in writing, of any record showing the monthly volume-weighted average VOC per gallon of all coatings, less water, to exceed 4.6 pounds per gallon. 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.
4. The permittee shall submit deviation reports which identify any record of an exceedance of the 12-month rolling OC emission limitation and/or material usage limitation. 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.
5. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

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

1. Emission Limitation

12.0 tons OC per rolling 12 months

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of coating and cleanup material usage; the organic compound content of each material used; if a recovery credit is to be used, the materials collected for off-site recovery, recycle, and/or disposal; and recordkeeping of the rolling 12-month summation of calculated OC emissions. Any recycle/recovery credit shall be calculated and applied and as per Section A.I.2.b. Formulation data from the manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the coatings, 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 from the emissions unit to the previous 11 month's emission calculations.

2. Emission Limitation

4.6 lbs VOC/gallon of coating as a monthly volume-weighted average when coating metal parts

Applicable Compliance Method

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping of coating usage on metal parts, the organic compound content of each coating used, and the calculated average VOC content per gallon of coatings applied to metal parts. 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. Each material's VOC content (VOC/gal) shall be multiplied by its usage (gal/mo); then the sum of these products shall be divided by the total gallons of materials applied during the month, to get the monthly volume weighted average.

3 Emission limitation

0.551 pound particulate emissions/hr from coating overspray

Applicable Compliance Method

Daily compliance with this limit shall be based on maintaining the requirements for the water curtain control equipment found in Sections A.II.2, A.III.2, and A.IV.2. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

4 Emission limitation

0.58 ton particulate emissions/yr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the water curtain control equipment specified under Sections A.II.2, A.III.2, and A.IV.2 of Part III, and meeting the 4,690 gallons per rolling 12 months coating usage limit.

5. Emission limitation

Visible particulate emissions shall not exceed twenty percent 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).

VI. Miscellaneous Requirements

Honda of America Manufacturing, Inc.

PTI Application: 01-05165

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: R016

This PTI (01-5165) supercedes the requirements found in PTI #01-704 for this emissions unit.

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>
R016 - Materials Test Lab (MTL) coating operations with electric drying oven (<i>Modification</i>)	Ohio Air Toxic 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 (R016) was evaluated based on the actual materials 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 over 1 ton per year, 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" pollutant:

Pollutant: n-Butyl Acetate
 TLV (mg/m³): 152 mg/m³
 Maximum Hourly Emission Rate: 1.24 lbs/hr
 Predicted 1-Hour Maximum Ground-Level Concentration: 841.2 ug/m³
 MAGLC : 16976 ug/m³ for n-Butyl Acetate, 3619 ug/m³ for lowest TLV toxic over 1 ton/year

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.).

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.

3. 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

Honda of America Manufacturing, Inc.

PTI Application: 01-05165

Issued: To be entered upon final issuance

Facility ID: 0180000130

Emissions Unit ID: R016

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None