

x Synthetic Minor Determination and/or x Netting Determination

Permit To Install: **01-12057**

A. Source Description

Honda of America, Inc. (Honda) is located in Marysville, Ohio, and is a manufacturer of automobiles and motorcycles. On June 23, 2006 Honda submitted a PTI for the installation of a new coating line, Line 1 liquid applied deadening (LASD). This coating line will be installed within the existing Line 1 body coating line, emissions unit K206 permitted under PTI 01-6743 issued 3/6/06. Honda is proposing federally enforceable permit restrictions of 63.5 tons of volatile organic compounds (VOC) per rolling 12-month period. A previously established federally enforceable production limit of 245,000 units (vehicles) per rolling 12-month period has been incorporated into this permit.

B. Facility Emissions and Attainment Status

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

The new coating line project will result in VOC emissions of 63.5 tons per year. In order to achieve a net decrease of VOC emissions and avoid triggering PSD, Honda has taken credit for several emissions units that have been shutdown at the facility. Please refer to the detailed netting tables found in Part II of the Facility Terms and Conditions of this permit. The overall net decrease of VOC emissions will be 124.0 tons per year.

The netting determination was based on a contemporaneous time period of 11/22/2001-3/1/07. The period begins five years prior to the start of construction for the project, which is proposed to occur in November 2006. The end of the period is when the project will begin normal operation (March 2007).

C. Source Emissions

K240 Line 1 Liquid Applied Sound Deadening:

The Line 1 Liquid Applied Sound Deadening will generate VOC emissions from the coating operation. Honda has proposed federally enforceable restrictions on the number of vehicles processed through this coating line and the tons VOC emissions.

<u>Pollutant</u>	<u>PTE Pre-Synthetic Minor PTI</u>	<u>PTE Post Synthetic Minor PTI</u>
VOC	166.0 tons/yr	63.5 tons/yr

D. Conclusion

The installation of Line 1 Liquid Applied Sound Deadening will result in a net decrease of VOC emissions of 124.0 tons per year, which is less than the VOC significant level of 40 tons per year as specified by 40 CFR Part 52.21. Therefore, the proposed Line 1 Liquid Applied Sound Deadening installation will "net out" and not trigger a New Source Review of the application under PSD regulations. The permit includes federally enforceable limits, operational restrictions, monitoring, and reporting to ensure continual compliance with the requirements that will maintain these levels of emissions.



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: 01-12057

Fac ID: 0180000130

DATE: 10/12/2006

Honda of America Mfg., Inc.
Stephen Fogle
24000 Honda Parkway
Marysville, OH 43040

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
III	MACT
	NSPS
	NESHAPS
Y	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

UNION COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-12057 FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America Mfg., Inc.**

On 10/12/2006 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 **24000 Honda Parkway, Marysville, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12057:

Line 1 liquid applied sound deadening application.

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.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



STATE OF OHIO ENVIRONMENTAL PROTECTION
AGENCY

**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 01-12057

Application Number: 01-12057
Facility ID: 0180000130
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honda of America Mfg., Inc.
Person to Contact: Stephen Fogle
Address: 24000 Honda Parkway
Marysville, OH 43040

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

Description of proposed emissions unit(s):
Line 1 liquid applied sound deadening application.

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 (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification
- 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, 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 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

Honda of America Mfg., Inc.

PTI Application: 01-12057

Issued: To be entered upon final issuance

Facility ID: 0180000130

permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Honda of America Mfg., Inc.

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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	63.5

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This evaluation was conducted to determine whether the proposed new project to install K240: Line 1 Liquid Applied Sound Deadening application, permitted in PTI 01-12057 constitutes a Major Modification as defined by OAC rule 3745-31-01(III).

The following tables include all emissions units at the Honda of America, Mfg. Inc. (HAM) plant that are being used to demonstrate a net decrease in VOC emissions for the entire facility. HAM consists of the East Liberty Auto Plant (ELP), the Marysville Motorcycle Plant (MMP), and the Marysville Auto Plant (MAP). The contemporaneous time period begins five years prior to the start of the construction project, 11/22/2001, and ends at commencement of operation, 03/01/2007.

Significant Modification Evaluation:

Objective: Determine if the permitting action proposed under 01-12057 (K240: Line 1 Liquid Applied Sound Deadening application) constitutes a Major Modification as defined by OAC rule 3745-31-01(III).

Methodology: In accordance with OAC rule 3745-31-01(SSS), one must use the following procedure for installation of new units.

Step 1. Calculate whether a significant emissions increase will occur.

- a. Calculate the sum of the difference between the potential to emit (PTE) from each new emissions unit following completion of the NSR project and the baseline actual emissions of these units before the NSR project. [OAC rule 3745-31-01(III)(4)(b)]

**Table I:
New Emissions Units -
potential to emit minus baseline actual*
(for this project-within past 12 months)**

Emission Units (EU)	EU Description	PTE following completion (VOC tons/yr)
K240	Line 1 Liquid Applied Sound Deadening application	166.0*
Total emissions increases for new or modified emissions units (project as defined within past 12 months) (tons)		166.0 tons VOC/yr

* PTE is based on the maximum hourly emission rate of 37.8 lbs VOC multiplied by 8760 hours per year and divided by 2000 lbs per ton. The PTE does not take into account any federally enforceable operational restrictions at the facility.

- b. If the values are greater than the significance level for the pollutants in question, then a significant emissions increase will occur. (Based upon Table II, a Significant Modification will occur.)

**Table II:
Summary Table**

	VOC (tons/yr)
New Emissions Unit	166.0
Trigger Levels	40
Significant Emissions Increase?	Yes

Step 2. Calculate whether a net emissions increase will occur.

- a. With respect to any regulated NSR pollutant emitted by a major stationary source, the amount by which the sum of (1) an increase in emissions; and (2) contemporaneous increases/decreases, exceeds zero. [OAC rule 3745-31-01(SSS)] The "2 yr Average Actual" is the Baseline Actual. [OAC rule 3745-31-01(O)]

**Table III:
Contemporaneous Increases/Decreases
and Shutdowns during 5 year period**

Plant*	Emissions Unit(s) ID	Source Description	Permit No.	Date of PTI / Change Date / Shutdown	Change Date Type	Baseline Years	Avg 2 Yr Actual Emissions (VOC tpy)	PTE / Projected Actual (VOC tpy)	Emissions Difference (VOC tpy)
MMP	K404	Line 4	01-8456	12/18	PTI DATE	1998, 1999	46	85.9	39.90
MMP	K404- burner	Line 4 burner	01-8456	12/18	PTI DATE			0.06 (0.552)	0.00
MAP	R200, R201, R202, R203, R204 (was R301, R302, R303, P301, P303)	POPA Coating Line	01-8167 (was 01- 999)	01/01	EMISSIONS CHANGE	1998, 1999	186.28	107.00	-79.28
MAP	R200, R201, R202, R203, R204 (was R301, R302, R303, P301, P303)	POPA burners	01-8167	01/01	EMISSIONS CHANGE		0.00	0.79	0.79
MAP	P304	OBL Sludge Pits	01-6648, 01-8282	02/01	SHUTDOWN	2000, 2001	1.0925	0	-1.09
MAP	K001	Civic pad machine	01-6380	03/01	SHUTDOWN	1998, 1999	34.735	0	-34.74
MAP	R013, R014, R015, P013, P015	OBL Coating Line	01-512	03/01	SHUTDOWN	1998, 1999	56.58	0	-56.58
MAP	K227, K228	Black Out	01-8502	03/07	EMISSIONS CHANGE	New Source	0.00	10.00	10.00
MAP	K214	Black Wax	01-6743	04/01	SHUTDOWN	1998, 1999	97.235	0	-97.24
MAP	R205	IP Painting	01-8376	06/18	EMISSIONS CHANGE	New Source	0.00	14.00	14.00
MAP	R205	IP Painting burners	01-8376	06/18	EMISSIONS CHANGE	New Source	0.00	0.17	0.17
MAP	Z330	4.5 MMBtu/hr - '02TV Mod	exempt	06/30	PTI DATE		0	0.11	0.11
MAP	Z331	4.5 MMBtu/hr - '02TV Mod	exempt	06/30	PTI DATE		0	0.11	0.11
MMP	K401	Line 1	01-8584	08/27	PTI DATE	1998, 1999	14.75	54.4	39.65
MMP	K401 - burner	Line 1 burner	01-8584	08/27	PTI DATE			0.25	0.00
MAP	P005, P200	Weld Sealer	01-8541	02/12	EMISSIONS CHANGE	2000, 2001	5.42	18.00	12.58
ELP	K024	LASD (Spray Melt Sheet)	05-12466	03/04	PTI DATE	2001, 2002	0	28.7	28.70
ELP	P025, P026	Injection Machine PTI	05-12753	09/25	PTI DATE		0	5.81	5.81
MAP		Pond Fire Pumps	exempt	12/01	PTI DATE		0.06	0.57	0.51
MAP		West Logistics AHU's	exempt	06/30	PTI DATE	New Source	0.00	0.40	0.40
MMP		ISG Generator		01/01	PTI DATE		0	0.03	0.03
MMP	P417	New Injection Machine	01-8875	01/13	PTI DATE	NA	0	4.3	4.30

MAP	B065, B066	Emergency Generators	01-8883	02/15	PTI DATE	New Source	0.00	1.00	1.00	
ELP	K002	Sealer/Deadener	05-13872	06/09	PTI DATE	2002, 2003	9.71	26.1	16.39	
MAP	K235	New L2 ECoat	01-8782	07/15	EMISSIONS CHANGE	NA		24.36	24.36	
MAP	K235, K238, K236, K237, P342, P343, P344, K239	Combustion Sources	01-8782	07/15	EMISSIONS CHANGE	NA		2.19	2.19	
MAP	K002	L2 E-Coat	01-6743	08/01	SHUTDOWN	2002, 2003	22.20	0	-22.20	
MAP	K238	New L2 LASD	01-8782	09/01	EMISSIONS CHANGE	NA		32.76	32.76	
MAP	K238	New L2 Sealer/Deadner	01-8782	09/01	EMISSIONS CHANGE	NA		24.55	24.55	
MAP	R002	L2 Sealer/Deadner	01-6743	09/09	SHUTDOWN	2003, 2004	22.69	0	-22.69	
MAP	P345	New Injection Machine	01-8894	11/15	EMISSIONS CHANGE	NA	0.00	3.70	3.70	
ELP	P027	Injection Machine PTI	05-14163	11/17	EMISSIONS CHANGE	NA	0	2.57	2.57	
MAP	K236	New L2 PrimerSurfacer	01-8782	11/26	EMISSIONS CHANGE	NA		225.10	225.10	
MAP	K237	New L2 Topcoat	01-8782	11/26	EMISSIONS CHANGE	NA		196.27	196.27	
MAP	K239	L1/L2 Polish	01-8782	11/26	EMISSIONS CHANGE	NA		2.10	2.10	
MAP	P341	Line 2 Sludge Pit	01-8782	11/26	EMISSIONS CHANGE	NA		10.56	10.56	
MAP	P342	New L2 ecoat sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00	
MAP	P343	New L2 Surfacer Sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00	
MAP	P344	New L2 On-line Repair Sanding	01-8782	11/26	EMISSIONS CHANGE	NA		0.00	0.00	
MAP	K003	L2 Primer Surfacer	01-6743	12/20	SHUTDOWN	2003, 2004	168.45	0	-168.45	
MAP	K004	L2 Topcoat	01-6743	12/20	SHUTDOWN	2003, 2004	403.69	0	-403.69	
MAP	K232/K233	L1/L2 Polish	01-8658	12/20	SHUTDOWN	2001, 2002	0.36	0	-0.36	
MAP	P006	Paint Mix	01-6743	12/20	SHUTDOWN	2001, 2002	0.00	0	0.00	
MAP	P103	L2 Ecoat sanding	01-6743	12/20	SHUTDOWN	2001, 2002	0.00	0	0.00	
MAP	P306	Sludge Pit	01-6647	12/20	SHUTDOWN	2001, 2002	0.42	0	-0.42	
MAP	P102	L2 P/S Sanding	01-6743	02/01	SHUTDOWN	2001, 2002	0.00	0	0.00	
MAP	NA	1900 U/D Market Flexibility (new oven burner)	NA	08/01	EMISSIONS CHANGE	2002, 2003	774.83	775.40	0.57	
MAP	NA	L1/L2 Misc Purge	01-6743	No change to source. Not shutdown.						0.00
MAP	K227, K228	L1/L2 Blackout	01-8502	No change to source. Not shutdown.						0.00

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MAP	R003	L2 Inner Wax	01-6743	No change to source. Not shutdown.					0.00
MAP	B039	FA-AH-49 - Air Handler	01-3194				0	0	0.00
MAP	X108	Combustion Sources	Varies						0.00

Total net emissions increases/decreases

-187.53

* MMP = Marysville Motorcycle Plant, MAP = Marysville Auto Plant, ELP = East Liberty Plant

**Table IV:
Summary Table -
sum of Table II and Table III**

	(VOC tons/yr)
Significant Emissions Increase	166.0
Contemporaneous Increases/Decreases	-187.5
Total Significant Net Emissions Increase	-21.5
Trigger Levels	40
Significant Net Emissions Increase?	No

This project will not result in a major modification because the NSR project does not cause a significant emissions increase or a significant net emissions increase. None-the-less, the permittee is proposing to accept synthetic minor limits for this project.

**Table V:
Synthetic Minor Limitations***

Emissions Unit (EU)	Description	VOC PTE (tons/yr)	
		Pre	Post
K240	Line 1 Liquid Applied Sound Deadening application	166.0	63.5
Total Synthetic Minor Limitations		-	63.5
Contemporaneous Increases/Decreases		-	-187.5
Total Increase		-	-124.0
Trigger Levels		-	40
Significant Net Emissions Increase AFTER Synthetic Minor restrictions?		-	No

* "Post" emission rates listed above are based upon the federally enforceable allowable emission rate, not the projected actual.

**Table VI:
Summary Table -
Final Determination**

	(VOC tons/yr)
Total Permitting Action without Synthetic Minor	166.0
Total Permitting Action with Synthetic Minor	63.5
Total Significant Net Emissions Increase with Synthetic Minor	-124.0
Significance Levels	40

Significant Increase from Permitting Action?
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No

Therefore this project will not result in a major modification because the NSR project does not cause a significant emissions increase.

2. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR Part 63, Subpart IIII upon promulgation of the final standard. On February 26, 2004, the U.S. EPA issued the final Subpart IIII. This new standard applies to the Honda of America Mfg., Inc. (Honda) facility and the emissions units included in this permit.
3. The permittee is subject to the rules of the Subpart IIII MACT standard as an existing major source with a compliance date as specified in the final standard. As specified in the Subpart, the permittee shall submit the following notifications:
 - a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the source's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and
 - v. a statement confirming the facility is a major source for HAPs.
 - b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:
 - i. the methods used to determine compliance;
 - ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

- iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;
- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

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

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 - (K240) - Line 1 Liquid Applied Sound Deadening Operation.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) content of the liquid applied sound deadening (LASD) employed in this emissions unit shall not exceed 0.32 lb/gallon.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C).</p>
OAC rule 3745-21-09(U)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
OAC rule 3745-31-05(C) (Synthetic Minor to avoid PSD)	<p>See Section A.II.1 and A.II.2 below.</p>
OAC rule 3745-31-28	<p>See Section A.I.2.b below.</p>

2. Additional Terms and Conditions

- 2.a Emissions unit K240 consists of robotic material applicators, associated material storage and transfer equipment and shares the primer-surfacer/LASD oven with K206. The primer-surfacer/LASD oven (K206) is currently permitted under PTI 01-6743, issued on 03/09/06.
- 2.b This emissions unit is subject to the MACT Subpart IIII requirements specified in Part II.2 and 3 of the Facility Specific Terms and Conditions for this permit.

II. Operational Restrictions

1. The emissions of VOC from this emissions unit shall not exceed 63.5 tons per year, based upon a rolling, 12-month summation of monthly emissions.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions Rate (tons of VOC)</u>
1	5.290
1-2	10.58
1-3	15.87
1-4	21.16
1-5	26.45
1-6	31.74
1-7	37.03
1-8	42.32
1-9	47.61
1-10	52.90
1-11	58.19
1-12	63.50

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

2. The maximum number of units (vehicles) processed through K240 shall not exceed 245,000 units per rolling 12-month period based upon a rolling 12-month summation of production rates.

The coating line (Line1) that this emissions unit will be a component of has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the number of units (vehicles), upon issuance of this permit.

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, as applied;
 - b. the VOC content of each coating as applied, in lbs/gallon;
 - c. the number of gallons of each coating employed;

- d. the rolling 12-month summation of voc emissions, in tons.
- e. the total production rate, in units (vehicles)/month; and
- f. the rolling, 12-month production rate, in units (vehicles).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all monthly records showing a calculated VOC emissions exceedance of the LASD emission limitation of 63.5 tons/rolling, 12-month period;
 - b. all monthly records showing an exceedance of the rolling, 12-month vehicle production limitation of 245,000 units.

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

2. The permittee shall submit an annual report by April 15th which specifies the total VOC emissions from this emissions unit. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.
3. The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the VOC emission rates of 0.32 lb/gal. Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.32 lb VOC/gal

Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements specified in Section III.1 above.
 - b. Emission Limitation:
63.5 tons VOC/ rolling, 12-month period.

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Applicable Compliance Method:

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K240) - Line 1 Liquid Applied Sound Deadening

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

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 Requirements

None