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: FINAL PERMIT TO INSTALL**
**UNION COUNTY**
**Application No:** 01-08282

**CERTIFIED MAIL**

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

**DATE:** 7/17/2001

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

**CC: USEPA** **CDO**

# FINAL PERMIT TO INSTALL 01-08282

Application Number: 01-08282

APS Premise Number: 0180000130

Permit Fee: **$100**

Name of Facility: Honda of America Manufacturing, Inc.

Person to Contact: Joanna Bambeck

Address: 24000 Honda Parkway
Marysville, OH 430409190

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

Description of proposed emissions unit(s):
**OBL paint effluent system - P304.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.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 <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

### 1. Compliance Requirements

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

### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### 3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

### 4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

### 5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**6. Construction of New Sources(s)**

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

| Pollutant | Tons Per Year |
|---|---|
| **OC** | **3.22** |

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

### A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P304 - Paint Effluent System for old bumper line (OBL), (Modification) | OAC rule 3745-31-05(A)(3) | The organic compound (OC) content of OC-containing water treatment materials, applied in the OBL paint effluent system, shall not exceed 0.7 lb/gal as a monthly, volume-weighted average. |
| | OAC rule 3745-31-05(D) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).<br>OC emissions shall not exceed 3.22 tons of OC per rolling 12 months, see Section A.I.2.a below. |
| | OAC rule 3745-21-07(G) | 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), See Section A.I.2.b below. |

**2. Additional Terms and Conditions**

**2.a** Emissions calculated from the previous 12 calendar months of material usage in the OBL paint effluent system (P304), including emissions from flocculents, detackifiers, defoamers, and other OC-containing materials added to the system, shall be used to calculate the rolling, 12-month emissions during the first 12 months of this permit.

**2.b** 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).

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the company identification for each material added to the OBL paint effluent system and documentation to show each to be non-photochemically reactive.

2. The permittee shall maintain the following monthly records for the materials added to the OBL paint effluent system:

   a. the company identification for each material added to the paint effluent system, for the purpose of paint overspray flocculation and removal, algae/bacterial control, and water treatment;

   b. the number of gallons of each OC-containing material added to the paint effluent system;

   c. the OC content of each OC-containing material added to the paint effluent system, in pounds per gallon;

   d. the monthly, volume-weighted average OC content of all OC-containing materials added to the paint effluent system, calculated as specified in Section A.V.1; and

   e. the total OC emissions from all OC-containing materials added to the OBL paint effluent system, in tons per rolling, 12-month period.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any calculated exceedance of the rolling, 12-month OC emissions from the OC-containing materials added the OBL paint effluent system. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Sections A.1.c.ii and B.11.

2. The permittee shall submit deviation (excursion) reports which identify any record showing the addition of a photochemically reactive material to the OBL paint effluent system. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Sections A.1.c.ii and B.11.

3. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing that the monthly volume-weighted average OC content of OC-containing materials, applied in the OBL paint effluent system, exceeded 0.7 pound of OC per gallon. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Sections A.1.c.ii and B.11.

4. The permittee shall submit annual reports which specify the total emissions of OC from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

## V. Testing Requirements

1. Emission Limitation

0.3 lb VOC/gallon 0.7 lb OC/gallon of material, added to the OBL paint effluent system as a monthly volume-weighted average

Applicable Compliance Method

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in Section A.III.1. Formulation data from each material's manufacturer or USEPA Method 24 shall be used to determine the OC content of the materials, to be used in the calculation of emissions. The monthly volume-weighted average shall be calculated for each month's usage as follows:

mo. volume weighted average = the summation of all materials i through z, calculated as: [(lbs OC/gal of material i) x (gal of material i/gal of all OC containing materials)] + ... + [(lbs OC/gal of material z) x (gal of material z/gal of all OC containing materials)]

2. Emission Limitation

3.22 tons OC/rolling 12 months

Applicable Compliance Method

Compliance with this limit shall be determined through maintaining monthly records of the name of materials added to the OBL paint effluent system, the amount of each organic material added, and the OC content of each material. Formulation data from the manufacturer or USEPA Method 24 shall be used to determine the OC content of each material. Emissions shall be calculated as follows:

OC Emissions=$\sum$ of the following product of all materials added during the month: (OC content of each material, in lbs/gal) X (amount of material added per month, in gal/mo)

Rolling, 12-month emissions shall be calculated by adding the current monthly emission calculations from the emissions unit to the previous 11 month's emission calculations.

## VI. Miscellaneous Requirements

This PTI (01-08282) supercedes the requirements found in PTI #01-6648 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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| P304 - Paint Effluent System for old bumper line (OBL), (Modification) | | Compliance with Air Toxic Policy |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P304) 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” stack and only pollutant exceeding 1 ton of emissions per year, modeled at 6.49 pounds of toxic per hour, which is the limit of OC emissions from this emissions unit:

   Pollutant: petroleum distillate

   TLV: Stoddard solvent 573 $mg/m^3$
   TLV: Gasoline 890 $mg/m^3$
   TLV: VM & P Naphtha 1398 $mg/m^3$

Maximum Hourly Emission Rate: 6.49 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3,210 ug/$m^3$

MAGLC : 13,633 ug/$m^3$

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

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

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

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

   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

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None

# NEW SOURCE REVIEW FORM B

PTI Number: 01-08282 Facility ID: 0180000130 Emissions Unit ID: **P304**

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION OBL paint effluent system - P304. CITY/TWP Marysville

SIC CODE 3711 SCC CODE 4-02-999-96 EMISSIONS UNIT ID P304

EMISSIONS UNIT DESCRIPTION Paint Effluent System for old bumper line (OBL), (Modification)

DATE INSTALLED

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

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|---|---|---|---|---|---|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| $PM_{10}$ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 6.49 | 3.22 | 6.49 | 3.22 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Petroleum distillates

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

| Please fill out the following. If the checkbox does not work, replace it with an 'X' | Electronic | **Additional information** File Name Convention (your PTI # plus this letter) | Hard Copy | None |
|---|---|---|---|---|
| Calculations (required) | ☐ | 0000000**c**.wpd | ☒ | |

**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08282 Facility ID: 0180000130 Emissions Unit ID: **P304**

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION OBL paint effluent system - P304. CITY/TWP Marysville

| | | | | |
|---|---|---|---|---|
| Modeling form/results | ☐ | 0000000**s**.wpd | ☒ | ☐ |
| PTI Application (complete or partial)* | ☐ | 0000000**a**.wpd | ☐ | ☐ |
| BAT Study | ☐ | 0000000**b.**wpd | ☐ | ☐ |
| Other/misc. | ☐ | 0000000**t**.wpd | ☐ | ☐ |

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

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

**NSR Discussion**

Applicable rules:

3745-21-07(G): all materials added to system are non-PRM
3745-31-05(D): synthetic minor: emissions not to exceed 3.22 tons per rolling 12 months
3745-31-05(A)(3): BAT : ~~0.3~~ **0.7** lb OC/gal of material added as a monthly volume-weighted average

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

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

Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

Honda of America, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April, 1996 Honda submitted a Title V application for the facility. This PTI was submitted to correct a previously issued permit for this emissions unit, PTI #01-6648, so as to include a new defoaming agent that is required for treatment of the paint effluent wastewater system. The PTI #01-6648 was written with restrictive language that only included flocculent and detackifier. The permit should have been written for "OC-containing materials" in order to prevent the restriction of additional water-treating materials.

**B. Facility Emissions and Attainment Status**

Honda is located in Union County. Union County is attainment for all pollutants. Honda's potential to emit is much greater than 250 tons of OC/VOC (organic compounds/volatile organic compounds) per year. Since potential emissions are greater than 250 tons per year, the facility is considered a major PSD facility. Honda has requested that this permit be issued as a Synthetic Minor with federally enforceable limits on OC/VOC emissions and treatment material usage. The potential emissions for this source are well under PSD significant levels for OC/VOC. The permitted emissions from this addition of this defoaming agent represents an increase of 3 tons of OC emissions per year from the previously permitted amount.

**C. Source Emissions**

This permit application was submitted to correct the restrictions established in PTI#01-6648 for this emissions unit. The permit was written with restrictive language that only included flocculent and detackifier. This permit shall allow the addition of a defoaming agent and other OC containing materials, that are required for water treatment. This permit has been written for "OC containing materials" in order to prevent this restriction of additional water-


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**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08282 Facility ID: 0180000130 Emissions Unit ID: **P304**

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION OBL paint effluent system - P304. CITY/TWP Marysville

treating materials. The addition of this OC containing defoaming agent increases the permit limit from 0.21 potential tons per year to 3.22 tons of potential OC emissions per year. These emissions were calculated at 100% loss from the paint effluent system, which overstates actual emissions from materials added in the cold water treatment process.

## D. Conclusion

Honda has requested that this permit be issued as a Synthetic Minor with federally enforceable permit restrictions on the monthly volume-weighted average OC content of materials add to the OBL wastewater treatment system (~~0.3~~ 0.7 lb/gal), and a limit of 3.22 tons of OC per rolling 12 months. The permitted emissions from the addition of this defoaming agent represents an increase of 3 tons of OC emissions per year from the previously permitted amount.

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

**NONE**

**Please complete:**

## SUMMARY (for informational purposes only)

## TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| OC | 3.22 |

**NEW SOURCE REVIEW FORM B**

PTI Number: 01-08282 Facility ID: 0180000130 Emissions Unit ID: **P304**

FACILITY NAME Honda of America Manufacturing, Inc.

FACILITY DESCRIPTION OBL paint effluent system - P304. CITY/TWP Marysville


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