



State of Ohio Environmental Protection Agency

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**CERTIFIED MAIL**

**RE: FINAL PERMIT TO INSTALL MODIFICATION**

**LOGAN COUNTY**

**Application No: 05-07923**

**Fac ID: 0546000117**

**DATE: 1/8/2008**

Honda of America East Liberty Plant  
Jeff Waid  
11000 State Rte 347  
East Liberty, OH 43319

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

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

CC: USEPA

SWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 05-07923

Application Number: 05-07923

Facility ID: 0546000117

Permit Fee: **\$0**

Name of Facility: Honda of America East Liberty Plant

Person to Contact: Jeff Waid

Address: 11000 State Rte 347  
East Liberty, OH 43319

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11000 State Rte 347**  
**East Liberty, Ohio**

Description of proposed emissions unit(s):

**Removal of the incinerator controlling both emissions units K007 and K008, the primary and secondary on-line repair lines.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
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 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.

**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>
PM	162.7
SO2	0.90
NOx	108.97
CO	90.62
VOC	1382.29
OC	1395.67

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

1. The following emissions units contained in this permit are subject to MACT Subpart IIII: K001, K003, K005, K006, K007, K008, K009, **K011**, K012, K013, and P006. These emissions units are subject to the applicable emission limitations(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3080 through 63.3176, including the Table(s) and Appendix(ices) referenced in Subpart IIII.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the "Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Southwest District Office.

**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 - (K001) - EDP Coating Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.062 kg/liter (0.52 lb/gallon) of applied solids, as a monthly, volume-weighted average.</p> <p>23.25 lbs VOC per hour</p> <p>See A.I.2.a, b, c, and d.</p> <p>emissions from natural gas combustion in the drying oven and the incinerator:</p> <p>0.05 lb PM10/hr  0.06 lb SO2/hr  1.00 lb NOx/hr  0.81 lb CO/hr  0.05 lb VOC/hr</p> <p>(See A.I.2.f.)</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).</p>
40 CFR Part 60, Subpart MM	The VOC emission limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)(1)	The VOC content limitation required by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	None (see A.I.2.g)
OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	None (see A.I.2.h)
OAC rule 3745-17-10(B) (for the indirect-fired ovens associated with this emissions unit)	The PE limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (for indirect-fired ovens associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1. and Part III.A.I.2.e)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

- 2.c** The 23.25 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.d** All the VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC .
- 2.e** In order to comply with the requirements 40 CFR Part 63.3091, K001 must demonstrate compliance with one of following limits/controls:
- i. Combined organic HAP emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems must not exceed 0.072 kg/liter (0.60 lbs/gal) of coating solids deposited during each month, determined according to the requirements in 40 CFR Part 63.3161.
  - ii. Each individual material added to the eletrodeposition primer system must contain no more than;
    - (a) 1.0 percent by weight of any organic HAP; and
    - (b) 0.10 percent by weight of any organic HAP, which is an Occupational Safety and Health Administrative (OSHA) defined carcinogen as specified in 29 CFR Part 1910.1200(d)(4).
  - iii. Emissions from all bake ovens used to cure eletrodeposition primers must be captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent.
- 2.f** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.g** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- 2.h** The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
3. The permittee shall burn only natural gas in this emissions unit.
4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## **III. Monitoring and/or Recordkeeping Requirements**

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

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
  3. The permittee shall maintain the following monthly records on all materials employed in this emissions unit:

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**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K001**

- a. the name and identification number of each material employed;
  - b. the VOC content for each material employed, in pounds per gallon;
  - c. the volume, in gallons, of each material employed;
  - d. the total VOC generated, in pounds per month (the summation of all materials employed ("b" x "c"));
  - e. the solids content of each material employed, in percent by volume;
  - f. the amount of solids applied, in gallons per month [(c x e) x transfer efficiency];
  - g. the amount of VOC captured, in percent by weight (based on the best available data, or the most recent stack test results);
  - h. the total amount of VOC vented to the control system, in pounds per month (the summation of "d" x "g");
  - i. the total controlled emissions, in pounds per month (the summation of "j" x (1-destruction efficiency), from the most recent stack test);
  - j. the total amount of VOC emitted, in pounds per month (["d" x (1-"h")] + "i");
  - k. the amount of VOC emitted, in pounds per gallon of solids applied ( "j" /"f"); and
  - l. the amount of VOC emitted, in kg per liter of applied solids ("k" x 0.1198).
4. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
- a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
5. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
- a. the name and identification number of each volatile liquid organic cleanup material employed;

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- b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
6. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. volatile organic compound (VOC) emissions exceed 0.062 Kg/liter (0.52 lb/gallon) of applied solids, as a monthly, volume-weighted average;
  - b. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - c. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
3. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

## **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:

0.062 kg VOC per liter of applied solids, as a monthly, volume-weighted average (0.52 lb VOC/gallon of applied solids)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.3. of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.4. of this permit.
  - c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.5, of this permit.

d. Emission limitation:

23.25 lbs VOC/hr

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{(Mu \times VC) \times Ce\} \times (1-De) + [(Mu \times VC) \times (1-Ce)]$$

where:

HER = maximum VOC emissions (lbs/hr);

Mu = maximum potential material usage per hour, in gallons;

VC = maximum VOC content of each material used, in pounds per gallon;

Ce = capture efficiency (based on best available data); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

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

e. Visible Emission Limitation:

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

f. Emission Limitations:

0.05 lb PM10/hr

0.06 lb SO2/hr

1.00 lb NOx/hr

0.81 lb CO/hr

0.05 lb VOC/hr

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Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (9,636 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>, 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM<sub>10</sub>, 1.9 lbs PM<sub>10</sub>/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix .

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM<sub>10</sub>

g. Emission Limitations:

The thermal oxidizer shall operate at a minimum VOC destruction efficiency of 90 percent, by weight.

Applicable Compliance Method:

Compliance with the VOC destruction efficiency requirements above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

2. If required the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted to demonstrate compliance with the 90% VOC destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
  - b. The following test methods shall be employed to demonstrate compliance:
    - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
    - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
    - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

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- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- v. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart III.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

**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 - (K001) - EDP Coating Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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

- 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 - (K003) - Guidecoat Coating Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007.</p> <p>149.9 lbs VOC per hour .</p> <p>5.4 pounds of particulate emissions (PE) per hour, from overspray.</p> <p>emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.20 lb PM10/hr  0.02 lb SO2/hr  4.05 lbs NOx/hr  3.40 lbs CO/hr  0.21 lb VOC/hr</p> <p>See A.I.2.e.</p>
OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B) (from overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.f)
OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.g)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

- 2.c** The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- 2.d** The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.e** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.f** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.g** The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
3. The permittee shall burn only natural gas in this emissions unit.
4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

### **III. Monitoring and/or Recordkeeping Requirements**

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

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
    - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
    - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
    - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
    - a. the name and identification number of each volatile liquid organic cleanup material employed;
    - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
    - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

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- d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
- a. the name and identification number of each coating;
  - b. the amount of each coating employed, in gallons per month;
  - c. the VOC content of each coating employed, in pounds of VOC per gallon;
  - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
6. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed; and

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- b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above. These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.
2. The permittee shall submit deviation reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit quarterly deviation reports that identify all times when the down draft scrubber control was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;
  - b. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - c. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
6. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

#### **V. Testing Requirements**

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

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a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.4.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2, of this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3., of this permit.

d. Emission Limitations:

5.4 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

e. Emission Limitations:

0.20 lb PM10/hr

0.02 lb SO2/hr

4.05 lbs NOx/hr

3.40 lbs CO/hr

0.21 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

f. Emission limitation:

149.9 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents;

Ce = capture efficiency (as determined during the most recent compliance demonstration); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance demonstration).

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

g. Emission Limitation:

Visible PE from overspray associated with this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

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

a. Destruction efficiency testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.

b. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

- ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
- iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

4. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

#### **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 - (K003) - Guidecoat Coating Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (K005) - Topcoat Line A**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>214.64 lbs volatile organic compounds (VOC) per hour</p> <p>10.8 pounds of particulate emissions (PE) per hour, from overspray</p> <p>See A.I.2.a, b, and c.</p> <p>emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.26 lb PM10/hr  0.031 lb SO2/hr  5.13 lbs NOx/hr  4.31 lbs CO/hr  0.27 lb VOC/hr  See A.I.2.e.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.</p>
OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B) (from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

- 2.d** The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.e** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.f** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.g** The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- 5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## **III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

- a. the name and identification number of each topcoat employed;
- b. the number of gallons employed of each coating;
- c. the VOC content, in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
- i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

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4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.
7. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the downdraft/scrubber control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

## **V. Testing Requirements**

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

- a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

- b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III. 2. , of this permit.

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c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.. 3., of this permit.

d. Emission Limitations:

0.26 lb PM10/hr  
0.031 lb SO<sub>2</sub>/hr  
5.13 lbs NO<sub>x</sub>/hr  
4.31 lbs CO/hr  
0.27 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10.

e. Emission limitation:

214.64 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

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

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
Mcu = Maximum Hourly Coating Usage, gallons per hour;  
Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
Te = Latest Transfer Efficiency results, in percentage transferred; and  
Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined]

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III. 1., of this permit.

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

a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

b. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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**Facility ID: 054600011**

**Emissions Unit ID: K005**

**VI. Miscellaneous Requirements**

None

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**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K005**

**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 - (K005) - Topcoat Line A**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (K006) - Topcoat Line B**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>214.64 lbs volatile organic compounds (VOC) per hour</p> <p>10.8 pounds of particulate emissions (PE) per hour, from overspray</p> <p>See A.I.2.a, b, and c.</p> <p>emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.26 lb PM10/hr  0.031 lb SO2/hr  5.13 lbs NOx/hr  4.31 lbs CO/hr  0.27 lb VOC/hr  See A.I.2.e.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) 3745-21-09(C)(1)(c) and 40 CFR, Part 60, <b>Subpart MM.</b></p>
OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B) (from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

- 2.d** The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.e** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.f** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.g** The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- 5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## **III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:

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- a. the name and identification number of each topcoat employed;
- b. the number of gallons employed of each coating;
- c. the VOC content in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
- i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

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4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
6. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.
7. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

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These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the downdraft/scrubber control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

## **V. Testing Requirements**

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

- a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

- b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2., of this permit.

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c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3., of this permit.

d. Emission Limitations:

0.26 lb PM10/hr  
0.031 lb SO<sub>2</sub>/hr  
5.13 lbs NO<sub>x</sub>/hr  
4.31 lbs CO/hr  
0.27 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10.

e. Emission limitation:

214.64 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

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

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
Mcu = Maximum Hourly Coating Usage, gallons per hour;  
Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
Te = Latest Transfer Efficiency results, in percentage transferred; and  
Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined]

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

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

a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

b. The following test methods shall be employed to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

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The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

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**VI. Miscellaneous Requirements**

None

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**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 - (K006) - Topcoat Line B**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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

- 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 - (K007) - Primary On-Line Repair Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>89.3 lbs volatile organic compounds (VOC) per hour.</p> <p>VOC emissions shall not exceed 1.06 kgs/liter (8.85 lbs/gallon) of applied solids, as a daily, volume-weighted average [from all primer/surfacer coating operations (emissions units K003 and K007).</p> <p>5.19 pounds of particulate emissions (PE) per hour, from overspray</p> <p>See Sections A.1.2.a, b, and c.</p> <p>emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following:</p> <p>0.21 lb PM10/hr            0.025 lb SO2/hr            4.08 lbs NOx/hr            3.43 lbs CO/hr            0.22 lb VOC/hr</p> <p>See Section A.1.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(C)(1)(c), <b>and</b> 40 CFR, Part 60, Subpart MM</p>
OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
40 CFR, Part 60, Subpart MM, 60.392(b)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
OAC rule 3745-21-09(C)(1)(a)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.e)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(see Section Part II.A.1.)

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The 89.3 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.d** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

## II. Operational Restrictions

- The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- The permittee shall burn only natural gas in this emissions unit.
- The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
  - a. the name and identification number of each coating;
  - b. the amount of each coating employed, in gallons per month;
  - c. the VOC content of each coating employed, in pounds of VOC per gallon;
  - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
7. The permittee shall maintain records that document any time periods when the downdraft/scrubber serving this emissions unit was not in service while this emissions unit was operating.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

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**Emissions Unit ID: K007**

- a. the combined daily volume weighted average VOC emissions from the use of primer/surfacer in emission units K003 and K007 exceed 1.06 kgs/liter (8.85 lbs/gallon) of applied solids;
  - b. the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;
  - c. the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period; and
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

## **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3., of this permit.

**Honda of America East Liberty Plant**  
**PTI Application: 05-07923**  
**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K007**

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4, respectively, of this permit.

d. Emission Limitations:

0.21 lb PM10/hr  
0.025 lb SO<sub>2</sub>/hr  
4.08 lbs NO<sub>x</sub>/hr  
3.43 lbs CO/hr  
0.22 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission limitation:

89.3 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = Cu \times VC$$

where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon;

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

5.19 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1-Te)] \times (1- Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;  
Mcu = Maximum Hourly Coating Usage, gallons per hour;  
Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;  
Te = Latest Transfer Efficiency results, in percentage transferred; and  
Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined]

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

i. Emission Limitation:

1.06 kg of VOC/liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average (from the use of primer/surfacer in emissions units K003 and K007, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

**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 - (K007) - Primary On-Line Repair Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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

- 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 - (K008) - Secondary On-Line Repair Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>8.7 lbs volatile organic compounds (VOC) per hour</p> <p>0.42 pounds of particulate emissions (PE) per hour, from overspray</p> <p>See Sections A.I.2.a, b, and c.</p> <p>emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following:</p> <p>0.21 lb PM10/hr  0.025 lb SO2/hr  4.08 lbs NOx/hr  3.43 lbs CO/hr  0.22 lb VOC/hr</p> <p>See Section A.I.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(C)(1)(c), 40 CFR, Part 60, Subpart MM.</p>
OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008,

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	None (see A.I.2.e.)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The 8.7 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.d** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

## **II. Operational Restrictions**

- 1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 2. The permittee shall burn only natural gas in this emissions unit.
- 3. The permittee shall operate a filter control system whenever this emissions unit is in operation.
- 4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## **III. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;

- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
- i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- 2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
- 3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
- 4. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- 5. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

6. The permittee shall maintain records that document any time periods when the filter control system serving this emissions unit was not in service while this emissions unit was operating.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;
  - b. the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - c. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009\* and K012\*, combined].

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

**Honda of America East Liberty Plant**  
**PTI Application: 05-07923**  
**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K008**

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.2., of this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3.

d. Emission Limitations:

8.7 pounds of VOC per hour

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = M_{cu} \times VOC_c$$

where:

HER = Hour Emission Rate, lbs per hour;

M<sub>cu</sub> = Maximum Hourly Coating Usage, gallons per hour; and

VOC<sub>c</sub> = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 24 or an appropriate alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart III.

e. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established Section A.III.1. of this permit.

f. Emission Limitations:

0.42 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitations:

0.21 lb PM10/hr

0.025 lb SO2/hr

4.08 lbs NOx/hr

3.43 lbs CO/hr

0.22 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NO<sub>x</sub>: 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM<sub>10</sub>, 1.9 lbs PM<sub>10</sub>/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM<sub>10</sub>

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

**VI. Miscellaneous Requirements**

None

**Honda of America East Liberty Plant**  
**PTI Application: 05-07923**  
**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K008**

**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 - (K008) - Secondary On-Line Repair Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (K009) - Wax/Polish Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit. [this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(d)]</p> <p>87.2 lbs VOC per hour</p> <p>0.29 lb particulate emissions (PE) per hour, for over spray</p> <p>See A.I.2.a and b.</p> <p>emissions from natural gas combustion in the air supply houses:</p> <p>0.07 lb PM10/hr  0.009 lb SO2/hr  1.49 lbs NOx/hr  1.25 lbs CO/hr  0.08 lb VOC/hr</p> <p>See A.I.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B), 3745-21-09(U)(2)(f) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.</p>
OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) (for

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	overspray).
40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoat employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-21-09(U)(2)(f)	See A.I.2.g.
OAC rule 3745-17-11(B) (for the air supply houses associated with this emissions unit)	None (see A.I.2.e)
OAC rule 3745-17-07(A) for the air supply houses associated with this emissions unit)	None (see A.I.2.f)
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 , P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The 87.2 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.d** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the air supply houses were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.f** The PE from the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.g** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## **II. Operational Restrictions**

- 1. The permittee shall burn only natural gas in this emissions unit.
- 2. The permittee shall operate a filter control system whenever this emissions unit is in operation.
- 3. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
- 4. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on all coatings other than topcoats employed in this emissions unit:
  - a. the name and identification number of each coat employed;
  - b. the amount of each coat employed, in gallons per month, excluding water and exempt solvents;
  - c. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents;
  - d. the calculated VOC generated from each coat employed, in pounds of VOC per month, (the summation of "b" x "c");
  - e. the combined VOC emissions from all of the non-topcoat coatings employed in this emissions unit, in pounds of VOC per month (the summation of "d" from all of the non-topcoat coatings employed in this emissions unit);
  - f. the combined non-topcoat coating usage employed in this emissions unit, in gallons per month, (summation of "b" from all of the non-topcoat coatings employed in this emissions unit); and
  - g. the volume weighted average VOC content of all non-topcoat coatings employed in this emissions unit, in pounds of VOC per gallon, excluding water and exempt solvents.
3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

- b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e., the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
6. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed; and
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC content of the coatings employed in this emissions unit, excluding topcoat operations, exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit;
  - b. the combined monthly volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 1.47 kg/liter (12.27 pounds per gallon) of applied solids;

- c. the combined daily volume weighted average VOC emissions from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012 exceed 15.1 lbs per gallon of applied solids;
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
2. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

## **V. Testing Requirements**

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

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009\* and K012\*, combined].

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3., of this permit.
  - c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4., of this permit.

d. Emission Limitations:

The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitations shall be determined through the record keeping requirements established in Section A.III.2.

e. Emission Limitations:

0.29 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitations:

0.07 lb PM10/hr  
0.009 lb SO2/hr  
1.49 lbs NOx/hr  
0.3 lbs CO/hr  
0.08 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10.

g. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

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**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
Emissions Unit ID: K009

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established Section A.III.1, of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

**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 - (K009) - Wax/Polish Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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

- 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 - (K011) - Final Repair Line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 15.8 lbs per hour.</p> <p>1.26 lbs of particulate emissions (PE) per hour</p> <p>See A.I.2.a and b.</p> <p>emissions from natural gas combustion:</p> <p>0.04 lb PM10/hr  0.005 lb SO2/hr  0.85 lbs NOx/hr  0.72 lb CO/hr  0.05 lb VOC/hr</p> <p>See A.I.2.d.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c).</p>
OAC rule 3745-31-05(C)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6 tons per rolling 12-month period.
OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3) [for overspray].
OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-17-(11)(B) (for the oven associated with this emissions unit)	None (see A.I.2.e)
OAC rule 3745-17-07(A) (for the oven associated with this emissions unit)	None (see A.I.2.f)

## 2. Additional Terms and Conditions

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The 15.8 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.d** The emission limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.f** The PE for the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
2. The permittee shall burn only natural gas in this emissions unit.
3. The permittee shall operate a filter control system whenever this emissions unit is in operation.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records that list the following information on the coatings employed in this emissions unit:
  - a. the name and identification number of each coating;
  - b. the number of gallons employed;
  - c. the VOC content, in pounds per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the daily volume weighted VOC content of all coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - f. the water and exempt solvents content, in percent by volume;
  - g. the nonvolatile (solids) content, in percent by volume; and
  - h. calculations showing the 12-month VOC emissions, in tons per rolling 12-month period.
2. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:
  - a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
3. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

- d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
4. For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.
  5. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
    - a. the number of units processed; and
    - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the VOC content exceed 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average;
  - b. the VOC emissions from the use of coatings exceed 6.0 tons per rolling 12-month period;
  - c. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period; and
  - d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
  
4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements established in section A.III.1., of this permit.

b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in section A.III.2., of this permit.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.3., of this permit.

d. Emission Limitation:

0.04 lb PM10/hr  
0.005 lb SO2/hr  
0.85 lbs NOx/hr  
0.72 lb CO/hr  
0.05 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (8,525 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

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**Modification Issued: 1/8/2008**

**Facility ID: 054600011**  
**Emissions Unit ID: K011**

\* for NO<sub>x</sub>, 100 lbs NO<sub>x</sub>/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM<sub>10</sub>, 1.9 lbs PM<sub>10</sub>/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO<sub>2</sub>, 0.6 lb SO<sub>2</sub>/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NO<sub>x</sub>, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM<sub>10</sub>, Methods 1 - 4 and 201; and for SO<sub>2</sub>, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM<sub>10</sub>

e. Emission limitation:

15.8 lbs VOC/hr

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = [Cu * VC]$$

where:

HER = maximum Hourly Emission Rate, in lbs of VOC/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

1.26 pounds PE/hr, from coating overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission limitation:

6.0 tons of VOC per rolling 12-month period

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.1.

i. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

**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 - (K011) - Final Repair Line**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (K012) - Specialty Coating Operation**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>17.4 lbs volatile organic compounds (VOC) per hour</p> <p>0.5 pounds of particulate emissions (PE) per hour, from overspray</p> <p>See A.I.2.a, b, and c.</p> <p>emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.14 lb PM10/hr  0.02 lb SO2/hr  2.85 lbs NOx/hr  2.40 lbs CO/hr  0.15 lb VOC/hr</p> <p>See A.I.2.e.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-21-08(B), 3745-23-06(B) and 3745-21-09(C)(1)(c) and 40 CFR, Part 60, Subpart MM.</p>
OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)(from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed

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Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)
OAC rule 3745-18-06(E)	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the SO <sub>2</sub> emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
OAC rule 3745-11-09(B) (from the direct-fired oven zones associated with this emissions unit)	None (See A.I.2.f)
OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	None (See A.I.2.g)
OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>

## **2. Additional Terms and Conditions**

- 2.a** The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.c** The VOC emissions from the use of topcoats that are baked in this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

The requirement to vent emissions to a thermal oxidizer does not include emissions from any topcoat that is air-dried. Air-dry coatings are materials that do not require baking to fully cure and baking is not required to ensure the performance characteristics of the coatings.

- 2.d** The 17.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.e** The emission limitations for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- 2.f** The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.g** The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## **II. Operational Restrictions**

- 1.** The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation and applying any topcoat that requires baking, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average

temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
3. The permittee shall burn only natural gas in this emissions unit.
4. The permittee shall operate a filter control system whenever this emissions unit is in operation.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
  - a. the name and identification number of each topcoat employed;
  - b. the number of gallons employed of each coating;
  - c. the VOC content, in pounds of VOC per gallon;
  - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
  - e. the water and exempt solvent content, in percent by volume;
  - f. the nonvolatile (solids) content, in percent by volume;
  - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
  - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
  - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

2. The permittee shall maintain the following monthly records on all coatings used to coat miscellaneous metal parts in this emissions unit:
  - a. the name and identification number of each coat employed; and
  - b. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
3. The permittee shall maintain the following monthly records on the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

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- a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;
  - b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and
  - c. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).
4. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
- a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
6. For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
7. The permittee shall maintain records that document any time periods when the filter control system serving this emissions unit was not in service while this emissions unit was operating.
8. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and applying any topcoat that requires baking. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than

50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
9. The permittee shall maintain the following monthly records on all non-topcoat coating used to coat the surface of automobiles and light-duty trucks in this emissions unit:
- a. the name and identification number of each coating employed; and
  - b. the VOC content of each coating employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
10. The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in A.II.1. above.
  - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
  - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
  - d. the combined VOC emissions ( not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;
  - e. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period; and
  - f. the VOC content of coatings employed in coating miscellaneous metal parts in this emissions unit exceeds 3.0 lbs of VOC per gallon, minus water and exempt solvents.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

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

3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and applying any topcoat that requires baking.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the filter control system was not in service while the emissions unit was in operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.
5. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in Section A.III.1., of this permit.
  - b. Emission Limitation:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section A.III.3., of this permit.
  - c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

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103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4., of this permit.

d. Emission Limitations:

0.14 lb PM10/hr  
0.02 lb SO2/hr  
2.85 lbs NOx/hr  
2.40 lbs CO/hr  
0.15 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 cu.ft/hr) by the emission factor\* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

\* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods\*\* of 40 CFR Part 60, Appendix A.

\*\* For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

\*\*\* All PM is assumed to be PM10

e. Emission limitation:

17.4 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

0.5 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and  
Ce = Overall control efficiency of the particulate control system).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined]

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in Section A.III.1, of this permit.

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

- a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- b. The following test methods shall be employed to demonstrate compliance:
  - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
  - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
  - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
  - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
  - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based

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on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

3. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

## **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 - (K012) - Specialty Coating Operation**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (K013) - Assembly Misc. Coating and Solvent Applications**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents, (this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i), (see A.I.2.b).</p> <p>The VOC emissions shall not exceed 19.6 pounds per hour nor 29.2 tons per rolling, 12-month summation, for all the coatings employed.</p> <p>The organic compound (OC) emissions, from the use of liquid organic material, not involved in coating metal parts, shall not exceed 5.8 pounds per hour nor 9.98 tons per rolling, 12-month summation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G), and 3745-21-09(U)(2)(f).</p>
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>(see Section Part II.A.1.)</p>
OAC rule 3745-21-09(U)(2)(f)	When coating miscellaneous metal parts (See Sections A.I.2.b. and A.II.3)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-07(G)	When employing liquid organic materials, not including coating metal parts, see A.II.2.

## 2. Additional Terms and Conditions

- 2.a** The 19.6 lbs VOC per hour limitation and the 5.8 lbs OC per hour limitation were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limits.
- 2.b** Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI # 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.

## II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.
2. The permittee shall not employ any liquid organic material, except for those materials employed to coat metal parts, that is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
3. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the miscellaneous metal coatings employed for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (in lbs/gallon, excluding water and exempt solvents) of each coating, as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

- d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B);
  - e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in gallons, of each coating employed (c), and sum the results for all the coatings employed; and
  - f. the rolling, 12-month VOC emissions for all the coatings employed, in tons.
2. The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
    - a. the name and identification number of each liquid organic material employed;
    - b. whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
    - c. the VOC and organic compound (OC) contents for each liquid organic material employed, in pounds per gallon;
    - d. the volume, in gallons, of each liquid organic material employed;
    - e. the total VOC and OC emission rates, in tons, per month;
    - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("e") plus the total amount of VOC emissions for the 11 previous calendar months); and
    - g. the rolling, 12-month total combined OC emitted from the above listed emissions units, in tons (the total individual OC emitted, in tons, for the current month ("e") plus the total amount of OC emissions for the 11 previous calendar months).
  3. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
  4. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
    - a. the number of units processed; and
    - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents;

- b. the VOC emissions exceed 29.2 tons per rolling, 12-month summation, for all the coatings employed; and
  - c. the organic compound (OC) emissions, from the liquid organic materials, not related to the metal coating operations in this emissions unit, exceed 9.98 tons per rolling, 12-month summation.
- 2. This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
  - 3. The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

**V. Testing Requirements**

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

- a. Emission Limitation:

The VOC emissions from the coatings employed shall not exceed 19.6 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$HER = [Cu * VC]$$

where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;  
Cu = the maximum potential coating usage rate, in gallons/hr; and  
VC = the maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance wit the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation:

The OC emissions from the use of liquid organic materials, other than coatings employed for metal coating, shall not exceed 5.8 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$\text{HER} = [\text{Su} * \text{VC}]$$

where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;

Su = the maximum potential usage rate, in gallons/hr; and

VC = the maximum VOC content, in pounds per gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

29.2 tons VOC per rolling, 12-month summation, from the use of coatings.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements specified in Section A.III.1. of this permit.

d. Emission Limitation:

9.98 tons OC per rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined through the record keeping requirements specified in Section A.III.2. of this permit.

e. Emission Limitation:

6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements specified in Section A.III.1. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

**Honda of America East Liberty Plant**

**PTI Application: 05-07923**

**Modification Issued: 1/8/2008**

**Facility ID: 054600011**

**Emissions Unit ID: K013**

**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 - (K013) - Assembly Misc. Coating and Solvent Applications**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (P001) - Pretreatment**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of low VOC emitting materials.  2.0 tons of particulate emissions per rolling 12-month rolling period.  0.28 tons of VOC per rolling 12-month period.  Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:  0.01 lb PM10/hr 0.002 lb SO2/hr 0.3 lbs NOx/hr 0.06 lbs CO/hr 0.02 lb VOC/hr
OAC rule 3745-17-11	None (see A.I.2.a)

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- 2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 , P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

## **II. Operational Restrictions**

None

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
  
38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

**Honda of America East Liberty Plant**

**PTI Application: 05-07923**

**Modification Issued: 1/8/2008**

**Facility ID: 054600011**

**Emissions Unit ID: P001**

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1, of this permit.

**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 - (P001) - Pretreatment**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (P002) - Body Line Paint Effluent System**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of low VOC emitting materials.  Organic Compound (OC) emissions shall not exceed 3.4 tons per rolling 12-month period
OAC rule 3745-21-07(G)	The OC limitation specified by this rule is less stringent than the OC limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the liquid organic material employed in this emissions unit:
  - a. the name and identification number of each liquid organic material employed;
  - b. the organic compound (OC) content for each liquid organic material employed, in pounds per gallon;
  - c. the volume, in gallons, of each liquid organic material employed;
  - d. the total OC emission rate, in tons, i.e, the summation of (b x c) for each liquid organic material employed divided by 2000 lbs/ton; and
  - e. the rolling, 12-month total combined OC emitted from this emissions unit, in tons (the total OC emitted, in tons, for the current month ("d") plus the total amount of OC emissions for the 11 previous calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The OC emissions from the use of liquid organic material employed in this emissions exceed 3.4 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

#### **V. Testing Requirements**

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

- a. Emission Limitations:

OC emissions of 3.4 tons/ rolling 12-month period.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to 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 - (P002) - Body Line Paint Effluent System**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (P003) - EDP Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of fabric filters.  Particulate (PE) emissions shall not exceed <b>0.15 lbs/hr</b> nor <b>0.25 tons</b> per rolling.
<b>OAC rule 3745-17-07(A)</b>	<b>The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.</b>
OAC rule 3745-17-11	None (see A.I.2.a)

**2. Additional Terms and Conditions**

- 2.a** The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).
- 2.b** The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

**II. Operational Restrictions**

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  
2. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed;
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months); and
  - c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units processed ("b") and the formula provided in section A.V.1.a.)

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
  - b. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

### **V. Testing Requirements**

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

a. Emission Limitations:

Particulate (PE) emissions of 0.15 lbs/hr nor 0.25 tons per rolling.

Compliance may be determined by the following equation:

$$\text{HER} = [(\text{Sv} \times \text{Sd} \times \text{Us}) \times (1 - \text{Oc}\%)]$$
$$\text{AER} = [(\text{Sv} \times \text{Sd} \times \text{Us}) \times (1 - \text{Oc}\%)] / 2000 \text{ lbs/ton}$$

where:

HER = the maximum OC Hourly Emission Rate , in lbs/hr;

AER = Annual Emission Rate, in tons/yr;

Sv = the sand volume produced, cubic feet per unit ( 0.000112 cubic feet/unit, Honda's PTI application);

Sd = density of sand, lbs/cubic ft, ( 84.29 lbs/cubic feet);

Us = Number of units sanded, (80 units per hour, 267,000 units per year); and

Oc% = Estimated Overall Capture and Control Efficiency, (assumed 80%).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

\* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions, sanding data, and solids density the potential uncontrolled emissions will be 1.26 tons of PE per year.

b. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

**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 - (P003) - EDP Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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 - (P004) - Surfacers Sanding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of fabric filters.  Particulate (PE) emissions shall not exceed 0.88 lbs/hr nor 1.33 tons per rolling.
OAC rule 3745-17-07(A)	The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
OAC rule 3745-17-11	None (see A.I.2.a)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).
- 2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

##### II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  
2. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed;
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months); and
  - c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units processed ("b") and the formula provided in section A.V.1.a.)

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
  - b. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

### **V. Testing Requirements**

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

a. Emission Limitations:

Particulate (PE) emissions of 0.88 lbs/hr nor 1.33 tons per rolling.

Compliance may be determined by the following equation:

$$\text{HER} = [\text{Sum of all coatings sanded (Sv x Sd x Us)}] \times (1 - \text{Oc}\%)$$
$$\text{AER} = [\text{Sum of all coatings sanded (Sv x Sd x Us)}] \times (1 - \text{Oc}\%)$$

where:

HER = the maximum PE Hourly Emission Rate, in lbs/hr;

AER = Annual Emission Rate, in tons/yr;

Sv = the sand volume produced, cubic feet per unit, (0.000215 cubic feet/unit, EDP, and 0.000268 cubic feet/hr, Primer);

Sd = density of sand, lbs/cubic ft, (84.29 lbs/cubic feet, EDP, and 118.56 lbs/cubic feet, primer);

Us = Number of units sanded, (88 units/hr and 267,000 units/yr); and

Oc% = Estimated Overall Capture and Control Efficiency, (assumed 80%).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

\* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions, sanding data, and solids density the potential uncontrolled emissions will be 6.66 tons of PE per year.

b. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1., of this permit.

**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 - (P004) - Surfacers Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (P006) - Process Welding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of particulate control device.  Use of low VOC emitting cleanup materials.  Particulate emissions (PE) shall not exceed 0.13 lbs/hr.  VOC emissions shall not exceed 4.56 tons per rolling 12-month period.
OAC rule 3745-21-07(G)	The OC limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11	None (see A.I.2.a)
40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.  Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.  (see Section Part II.A.1.)

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

## **II. Operational Restrictions**

1. The amount of welding wire employed in the process welding, emissions unit P006, shall not exceed 21.2 tons per month, nor 250 tons per rolling 12-month period.
2. See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176).

## **III. Monitoring and/or Recordkeeping Requirements**

1. This facility shall maintain monthly records that list the following information:
  - a. the amount of welding wire employed, in tons;
  - b. the total amount of welding wire employed in the previous rolling 12-month period;
  - c. the amount of each sealer employed, in gallons;
  - d. the amount of each anti-spatter employed, in gallons;
  - e. the VOC content of the each sealer and anti-spatter employed, in lbs per gallon;
  - f. the total number of spot welds performed;
  - g. the calculated monthly VOC emissions, in tons per month, (based on the equation in section A.V.1.b. of this permit); and
  - h. the calculated rolling 12-month VOC emissions, in tons per rolling 12-month period, (the summation of the VOC emissions from "g" plus the total calculated VOC emissions from the previous 11 month period).
2. See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176).

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The period(s) when the amount of welding wire employed in this emissions unit exceed 21.2 tons per month and/or 250 tons per rolling 12-month period; and
  - b. any period(s) when the VOC emissions exceed 4.56 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

2. See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176).

## **V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
  
Particulate (PE) emissions of 0.13 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$HER = \{[(Wu \times Ef) \times Cp\%] \times (1 - Ce\%)\} + [(Wu \times Ef) \times (1 - Cp\%)]$$

where:

HER = the maximum OC Hourly Emission Rate , in lbs/hr;

Wu = Wire usage, lbs/hr, (Max. usage rates: 57 lbs/hr, 250 tons/yr);

Ef = Emission Factor, lb/lb, ( 0.01 lb/lb);

Cp% = Capture efficiency, (assumed 85%); and

Ce% = Control Efficiency, (assumed 90%).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitations:

VOC emissions of 4.8 tons/ rolling 12-month period.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.1, of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

**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 - (P006) - Process Welding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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 - (P014) - On-line Repair Sanding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of fabric filters.  Particulate (PE) emissions shall not exceed 0.89 tons per rolling 12-month period.
OAC rule 3745-17-07(A)	The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
OAC rule 3745-17-11(B)(2) Figure II Curve P-2	See A.I.2.b.

##### 2. Additional Terms and Conditions

- 2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.b The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

##### II. Operational Restrictions

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  
2. The permittee shall maintain the following monthly records for this emissions unit;
  - a. the number of units sanded;
  - b. the rolling, 12-month total number of units sanded, (the total number of units sanded, for the current month ("a") plus the total number of units sanded during the 11 previous calendar months); and
  - c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units sanded ("b") and the formula provided in section A.V.1.a.)

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
  - b. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

### **V. Testing Requirements**

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

a. Emission Limitations:

Particulate (PE) emissions of 0.89 tons per rolling.

Compliance may be determined by the following equation:

$$\text{AER} = \{ \text{Sum of all coatings sanded} [(Sv \times Mu \times Pr \times Sd) \times (1 - Oc\%)] \} / 2000 \text{ lbs/tons}$$

where:

AER = Annual Emission Rate, in tons/yr;

Sv = the sanded volume produced, in cubic ft/unit ( 0.000041 cubic ft/unit, for EDP, 0.000262 cubic ft/unit, Primer, 0.000177 cubic ft/unit, Base, and 0.001050 cubic ft/unit Clear );

Mu = Maximum number of unit processed, (267,000 units per rolling 12-month period);

Pr = Percentage of units repaired in this emissions unit, as based on a rolling 12-month average, (See Section III.2), ( 26% is assumed, until records demonstrate actual percentage);

Sd = density of sand, lbs/cubic ft (84.29 lbs/cubic ft, EDP, 118.56 lbs/cubic ft, Primer, 106.15 lbs/cubic feet, Base , 70.56 lbs/cubic ft, Clear ); and

Oc% = Estimated Overall Capture and Control Efficiency (assumed 80%).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

\* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions, sanding data, and solids density the potential uncontrolled emissions will be 4.47 tons of PE per year.

b. Emission Limitations:

Particulate (PE) emissions of 17.4 lbs/hr.

Compliance may be determined by the following equation:

$$A = 0.2 \times U$$

where:

A = Allowable hourly emission rate, in lbs/hr; and

U = Uncontrolled particulate emission rate, lbs/hr (87.04 lbs/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**Honda of America East Liberty Plant**

**PTI Application: 05-07923**

**Modification Issued: 1/8/2008**

**Facility ID: 054600011**

**Emissions Unit ID: P014**

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1.

**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 - (P014) - On-line Repair Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

### 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 - (P016) - All-Body Repair Sanding

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Use of fabric filters.  Particulate (PE) emissions shall not exceed 0.23 tons per rolling 12-month period.  The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 shall not exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.
OAC rule 3745-17-07(A)	The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
OAC rule 3745-17-11(B)(2) Figure II Curve P-2	See A.I.2.b.

#### 2. Additional Terms and Conditions

- 2.a The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- 2.b The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

## **II. Operational Restrictions**

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
2. The permittee shall maintain the following monthly records for this emissions unit:
  - a. the number of units sanded;
  - b. the rolling, 12-month total number of units sanded, (the total number of units sanded, for the current month ("a") plus the total number of units sanded during the 11 previous calendar months); and
  - c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units sanded ("b") and the formula provided in section A.V.1.a.).

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
  - b. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

**V. Testing Requirements**

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

a. Emission Limitations:

Particulate (PE) emissions of 0.23 tons per rolling.

Compliance may be determined by the following equation:

$$\text{AER} = \{ \text{Sum of all coatings sanded} [(Sv \times Mu \times Pr \times Sd) \times (1 - Oc\%)] \} / 2000 \text{ lbs/tons}$$

where:

AER = Annual Emission Rate, in tons/yr;

Sv = the sanded volume produced, in cubic ft/unit ( 0.004575 cubic ft/unit, for basecoat, and 0.015249 cubic ft/unit, for clearcoat );\

Mu = Maximum number of unit processed, (267,000 units per rolling 12-month period);

Pr = Percentage of units repaired in this emissions unit, as based on a rolling 12-month average (See Section III.2), ( 0.55% is assumed, until records demonstrate actual percentage);

Sd = density of sand, lbs/cubic ft (106.15 lbs/cubic feet, Basecoat, and 70.56 lbs/cubic feet, clear coat); and

Oc% = Estimated Overall Capture and Control Efficiency (assumed 80%).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

\* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions, sanding data, and solids density the potential uncontrolled emissions will be 1.14 tons of PE per year.

b. Emission Limitations:

Particulate (PE) emissions of 6.6 lbs/hr.

Compliance may be determined by the following equation:

$$A = 0.2 \times U$$

where:

A = Allowable hourly emission rate, in lbs/hr; and

U = Uncontrolled particulate emission rate, lbs/hr (33.0 lbs/hr).

**Honda of America East Liberty Plant**

**PTI Application: 05-07923**

**Modification Issued: 1/8/2008**

**Facility ID: 054600011**

**Emissions Unit ID: P016**

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1.

**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 - (P016) - All-Body Repair Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

**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 - (P017) - Inspection Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate (PE) emissions shall not exceed 0.1 lbs/hr nor 0.19 tons per rolling 12-month period.
OAC rule 3745-17-07(A)	The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
OAC rule 3745-17-11	See A.2.a.

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).
- 2.b The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003, P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

**II. Operational Restrictions**

1. The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P004, P014, P016, and P017:
  - a. the name and identification number of each volatile liquid organic cleanup material employed;
  - b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;
  - c. the volume, in gallons, of each volatile liquid organic cleanup material employed;
  - d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton;
  - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
  - f. the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility , in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).
  
2. The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
  - a. the number of units processed;
  - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months); and
  - c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units processed ("b") and the formula provided in section A.V.1.a.).

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
  - b. The combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period.

These reports shall be due by the dates specified in Part I - General Terms and Conditions A.1.c.ii. of this permit.

### **V. Testing Requirements**

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

a. Emission Limitations:

Particulate (PE) emissions of 0.1 lbs/hr nor 0.19 tons per rolling.

Compliance may be determined by the following equation:

$$\text{HER} = (\text{Sv} \times \text{Sd})$$

$$\text{AER} = [\text{HER} \times 8760\text{hrs/yr}] / 2000 \text{ lbs/tons}$$

where:

HER = the maximum OC Hourly Emission Rate , in lbs/hr;

AER = Annual Emission Rate, in tons/yr;

Sv = the sanded volume produced, cubic feet per hour ( 0.00002 cubic ft/unit x 73 units/hr= 0.00146 cubic ft/hr); and

Sd = density of sand, lbs/cubic ft ( 70.56 lbs/cubic feet ) .

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.1, of this permit.

**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 - (P017) - Inspection Sanding**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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