



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

10/29/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

01-80-00-0130 - TVP021
Honda of America Mfg., Inc., Marysville Auto Plant
Joanna Bambeck
24000 Honda Parkway
Marysville, OH 43040-9251

Dear Joanna Bambeck:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Central District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Central District Office.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large, stylized initial 'T'.

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

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Central District Office



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 10/29/99

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway
Marysville, OH 43040-9251

of a Title V permit for Facility ID: 01-80-00-0130

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

F096 (Roadways/Parking Areas)

Vehicle traffic on roadways and parking areas

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 applicable, the permittee shall 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”); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
 - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

4. 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.

5. 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.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. The Title V permit of Honda America Mfg. Inc. has been separated into 8 actions. This action, TVP021, covers roadways and parking areas inside this facility.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B409- ISG Emergency Generator No. 5
Z159- Fire Station Emergency Generator
Z160- BRWP Emergency Generator
T020- Service Center Tank
T021- Service Center Tank
Z555- AMH Gasoline Dispensing Facility
G004- Auto serv. Center Gasoline Dispensing Fac.
F097- Concrete Piles
F401- Benton Road Water Plant Material Handling

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Roadways/Parking Areas (F096)

Activity Description: Vehicle traffic on roadways and parking areas

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and parking areas	None	(see A.I.2.a below)
unpaved roadways and parking areas	None	(see A.I.2.a. below)

2. Additional Terms and Conditions

- 2.a This emissions unit is not located in an Appendix A area of OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and parking areas (see Section B.1.2.a through B.1.2.k)	OAC rule 3745-31-05 (PTI 01-6423)	no visible particulate emissions except for one minute during any 60- minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections B.1.2.m, B.1.2.n, B.1.2.p, and B.1.2.r through B.1.2.t)
unpaved roadways and parking areas (see Section B.1.2.l)	OAC rule 3745-31-05 (PTI 01-6423)	no visible particulate emissions except for three minutes during any 60- minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections B.1.2.o, B.1.2.p, B.1.2.q, B.1.2.s and B.1.2.t)

2. Additional Terms and Conditions

2.a The paved roadways located at the Marysville Auto Plant (MAP), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways	miles	area(ft2)
MAP 4-lane roadway	0.412	174,000
MAP West lot 1, roadway 1	0.038	6,000
MAP West lot 1, roadway 2	0.252	39,900
MAP West lot 1, roadway 3	0.167	26,400
MAP East lot roadway 1	0.085	13,500
MAP East lot roadway 2	0.114	18,000
MAP East lot roadway 3	0.076	12,000
MAP 4-lane from ADC to FTZ	0.171	72,000
MAP Roadway to facilities	0.758	120,000
MAP Drive behind MAP	0.417	66,000
MAP Honda engineering	0.025	4,020
MAP Drive to short track	0.125	19,800
MAP Auto short test track	0.125	19,500
MAP Auto long test track	0.250	39,600
MAP West entrance	0.171	72,000
MAP FTZ to container yard	0.133	56,000
MAP Container yard to boiler	0.123	26,000
MAP Misc. drives and access	0.500	79,200
MAP East gate	0.059	24,800
MAP Drive to FTZ & 4-lane	0.182	76,800
Paved Parking Areas		
	miles	area(ft2)
MAP West parking lot 1	0.097	174,000
MAP West parking lot 2	0.089	637,050
MAP East parking lot	0.089	281,376
MAP ADC parking lot	0.034	38,880
MAP Container lot	0.250	937,200
MAP North repair lot 1	0.116	243,351
MAP North repair lot 2A	0.047	75,900
MAP North repair lot 2B	0.076	121,450
MAP South repair lot	0.076	247,806

2.b The paved roadways and parking areas located at the Marysville Motorcycle Plant (MMP), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways	miles	area(ft2)
MMP Roadways	0.294	62,000
MMP Drive to test track	0.246	39,000
MMP Test track	0.500	167,301
MMP Rear drives	0.125	26,400
Paved Parking Areas		
	miles	area(ft2)
MMP Assoc. parking areas	0.250	526,536
MMP Lot across road	0.039	34,284
MMP Rec area drive & parking	0.049	20,862

2. Additional Terms and Conditions (continued)

2.c The paved roadway and parking area located at the Benton Road Water Plant (BWS), that is covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadway & Parking Area	miles	area(ft2)
BWS Driveway & parking	0.035	5,610

2.d The paved roadway and parking areas located at American Honda (AH) at the Marysville Auto Plant, that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadway	miles	area(ft2)
AH Drive from MAP	0.159	67,200
Paved Parking Areas	miles	area(ft2)
AH Am. Honda assoc. lot 1	0.061	25,600
AH Am. Honda assoc. lot 2	0.061	25,600
AH Am. Honda auto lot	0.492	3,510,000
AH Am. Honda shipping yard 1	0.275	580,000
AH Am. Honda shipping yard 2	0.180	332,500
AH Am. Honda new auto lot	0.091	192,000

2.e The paved roadways and parking area located at the Marysville Intermodal Terminal (MIT), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways	miles	area(ft2)
MIT Main entrance drive	0.237	93,750
MIT Drive from MAP container	0.426	56,250
Paved Parking Area	miles	area(ft2)
MIT Intermodal trans. area	0.635	1,340,000

2.f The paved roadway and parking area located at the Honda Associates Service Center (HSC), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadway	miles	area(ft2)
HSC Drive to service center	0.258	38,080
Paved Parking Area	miles	area(ft2)
HSC Parking area	0.104	94,050

2.g The paved roadways and parking area located at the Honda Sports Center (WMSC), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways	miles	area(ft2)
WMSC Drive into sports center	0.019	3,000
WMSC Drop off circle	0.057	9,000
Paved Parking Area	miles	area(ft2)
WMSC Parking area	0.057	69,000

2. Additional Terms and Conditions (continued)

2.h The paved roadway and parking areas located at the Honda Marysville Office of Administration (HMO), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadway	miles	area(ft2)
HMO Main entrance	0.057	12,000
Paved Parking Areas	miles	area(ft2)
HMO Assoc. parking lot	0.066	35,000
HMO North parking lot	0.047	15,000

2.i The paved roadway and parking area located at the Honda Federal Credit Union (HFCU), that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadway	miles	area(ft2)
HFCU Driveway	0.258	38,080
Paved Parking Area	miles	area(ft2)
HFCU Parking area	0.104	94,050

2.j The paved roadways and parking areas located at the International Parts Supply (IPS), an auto component supplier to Honda, that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways	miles	area(ft2)
IPS East drive	0.117	36,960
IPS Parking lot entrance	0.071	11,250
IPS West driveway	0.049	6,500
Paved Parking Areas	miles	area(ft2)
IPS Auto parking area	0.063	78,540
IPS East dock yard	0.121	121,600
IPS West shipping area	0.041	14,824
IPS Truck garage	0.027	3,500
IPS Storage area	0.014	1,875

2. Additional Terms and Conditions (continued)

2.k The paved roadways and parking areas located at Midwest Express, Inc. (MEI), an auto component supplier to Honda, that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Paved Roadways		miles	area(ft2)
MEI	Drive to assoc. lot	0.010	2,000
MEI	Drive to office lot	0.013	2,100
MEI	Truck gate 1	0.090	28,500
MEI	Truck gate 2	0.053	14,000
MEI	Truck gate 3	0.051	21,600
MEI	Rear drive	0.064	8,500
MEI	Dolly pad access	0.025	10,400
MEI	South drive	0.142	45,000
MEI	Drive to So. dolly pad	0.076	32,000

Paved Parking Areas		miles	area(ft2)
MEI	Associate lot	0.123	110,000
MEI	Office lot	0.076	64,000
MEI	Truck dock areas	0.758	180,000
MEI	Truck areas	0.568	540,000
MEI	Rear truck area	0.214	248,600
MEI	East auto lot	0.110	63,800
MEI	East dolly pad	0.111	146,250
MEI	Rear of M2C	0.057	3,300
MEI	South dolly pad	0.114	126,000
MEI	Trailer park 1	0.076	120,000
MEI	Trailer park 2	0.133	210,000

2.l The unpaved roadways and unpaved parking areas located at Honda of America, that are covered by this permit and subject to the above-mentioned requirements, are listed below:

Unpaved Roadways		miles	area(ft2)
MAP	Access from Benton	0.466	49,200
BWS	Access drives behind PLT	0.121	12,800
IPS	W. rear access drive	0.066	13,120

Unpaved Parking Areas		miles	area(ft2)
MMP	Gravel overfill lot	0.043	31,163
MAP	Gravel lot 1	0.123	51,020
MAP	Gravel lot 2	0.028	13,120
HFCU	Temp construction lot	0.038	22,000
IPS	North dock yard	0.044	51,020

2.m The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to sweeping the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.n The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water or other suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee may, upon receipt of written approval from the Ohio EPA Central District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

Facility Name: **Honda of America Mfg., Inc.**
Facility ID: **01-80-00-0130**

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