



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Mr. Andrew Hall  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

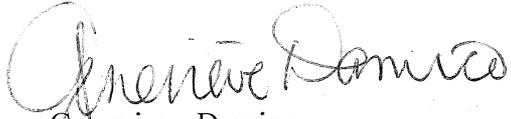
Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Plantwide Applicability Limit (PAL) permit, permit number P0113353, for Honda of America Manufacturing, Inc., Marysville Auto Plant in Marysville, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

1. OAC 3745-31-32 (A)(11)(a)(i) requires the PAL permit to contain enforceable monitoring requirements that determine PAL pollutant emissions in terms of mass per unit time. The monitoring requirements do not yield mass-per-unit-time data for emissions units B036, B064, P342, P343, P344, and P346. The monitoring requirements for these emissions units must be modified to comply with the PAL monitoring regulations.
2. Ohio Administrative Code (OAC) 3745-31-32 (A)(11)(f)(iii) requires that a facility using emission factors to monitor PAL pollutant emissions shall conduct validation testing to determine a site-specific emission factor within six months of PAL permit issuance unless the director determines testing to not be required. Also, OAC 3745-31-32 (A)(11)(i) requires that all data used to establish a PAL limit must be re-validated through performance testing or other scientifically valid means and that such testing must occur at least once every five years after issuance of the PAL. The draft permit shows that AP-42 emission factors will be used to determine compliance with the PAL emission limits, whereas doing emission testing to formulate a site-specific emission factor would give a better estimate of emissions. Please revise the permit so that it requires validation testing to determine site-specific emission factors to then be used to assure compliance with the emission limits, re-validated through performance testing at least once every five years, or explain why such emissions testing is not technically practicable.

We appreciate the opportunity to provide comments on this draft permit. If you have any Questions, please feel free to contact me or have your staff contact Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name.

Genevieve Damico  
Chief  
Air Permits Section