



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

DEC 18 2013

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 P0113358, for Honda of America, East Liberty Plant in East Liberty, 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. 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.
2. The draft permit requires emission testing for emission unit K003 (Guidecoat Line) and emission unit K024 (Spray Melt Sheet Operation). Will the testing results be used to calculate an emission factor to be used for monitoring to assure compliance with the PAL limits?
3. Page 87 of the draft permit requires destruction efficiency testing to be conducted within 6 months prior to permit expiration for emission units K005 and K006

(Topcoat Lines A and B). Since the permit term for a PAL is 10 years, and as written, the testing could occur 9 ½ years after permit issuance for a 10 year permit term, this language should be revised to require that the testing be done at least as early as 5 years within permit expiration.

4. Page 53 of the draft permit requires emissions testing for Volatile Organic Compounds for emission unit K001 (EDP Coating Line). Please revise the permit so that it includes the frequency of the testing.

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 Rich Angelbeck, of my staff, at (312) 886-9698.

Sincerely,



Genevieve Damico
Chief
Air Permits Section