



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

JUN 18 1996

REPLY TO THE ATTENTION OF:

(AR-18J)

Mike Hopkins  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
1800 WaterMark Drive  
Columbus, Ohio 43215-1099

Dear Mr. Hopkins:

The purpose of this letter is to provide you with the United States Environmental Protection Agency's (USEPA) comments on the permit to install (PTI) for Honda of America Manufacturing, Inc. (Application number 01-6071) located in Marysville, Ohio. This PTI permits Honda to make modifications to Line 1 at the Marysville facility. Honda accepted limitations which would limit the emission increase to 36.7 tons of volatile organic compounds (VOC) per year over its past actual emissions.

In December of 1995 this same facility was issued a PTI allowing Honda to make modifications for Line 2. The PTI provided for an increase of 35.3 tons of VOC per year. In essence, Honda was permitted twice within the past year for emission increases which were individually less than the significant modification threshold under the Prevention of Significant Deterioration (PSD) regulations but additively the emission increases were greater than the threshold. We consider this to be strong evidence of an intent to circumvent the requirements of preconstruction review as described in the June 13, 1989, "Guidance on Limiting Potential to Emit in New Source Permitting" memo from Terrell Hunt and John Seitz.

Unless Honda can provide strong evidence that the modifications to Line 1 were not contemplated at the time that the modifications to Line 2 were undergoing review, we believe that these projects should be evaluated as a major modification under the PSD regulations.

Additional comments can be found in Enclosure 1. If you have any questions regarding this letter, please contact Genevieve Nearmyer, of my staff, at (312) 353-4761.

Sincerely yours,

  
Cheryl L. Newton, Chief  
Permits and Grants Section

Enclosure

EPA5POH017706

Enclosure 1

1. The annual emissions limitation in condition 2 under the additional Special Terms and Conditions section should include all the VOC emitting units such as R102 and R103.
2. The annual emissions limitation in condition 2 under the additional Special Terms and Conditions section is not enforceable as a practical matter. At the very least compliance with the annual limit should be on a 12 month rolling average basis.

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