



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

CERTIFIED MAIL # 91 7108 2133 3932 4449 1042

June 28, 2011

Union County  
Honda R&D North America  
OEPA ID: 0180000156  
Air Compliance Inspection

Stephen Stutz  
Safety, Environmental, Health and Security Coordinator  
Honda R&D North America  
21001 State Route 739  
Raymond, OH 43067-9705

Re: **Notice of Violation**  
**2011 Compliance Inspection**

Dear Mr. Stutz:

On May 12, 2011, Ohio EPA Central District Office (CDO) met with you for the purpose of conducting a Full Compliance Evaluation (FCE) of Honda R&D North America (Honda R&D) in Raymond, Ohio. The purpose of the inspection was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations.

Compliance was assessed based upon an examination of each emissions unit at the facility, an examination of monitoring and record keeping files maintained at the facility and a review of compliance reports and fee emissions reports maintained at CDO. Below is a summary of the inspection findings, violations (if any), and action items that need to be addressed.

1. **Finding:**

On December 19, 2007, Ohio EPA received the most recent copy of Honda R&D's Title V permit application. Since that time, the following emissions units were issued permits-to-install, were installed, and commenced operation: K005, B035, B036, B037 and B042. Ohio EPA has not received a revised Title V permit application for these emissions units.

**Requested Action**

Ohio EPA requests that Honda R&D submit a revised Title V permit application for emissions units K005, B035, B036, B037 and B042 within 90 days of receipt of this letter.

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2. **Finding:**

On March 16, 2009, Ohio EPA issued PTI P0104489 to Honda R&D for emissions unit K005. The K005 Test Paint Spray Booth was permitted to be installed with a dry particulate filter operating at 98% efficiency. K005 has since been installed with a water curtain instead of a dry particulate filter. PTI P0104489 was not modified to reflect this change.

**Requested Action**

Ohio EPA requests that Honda R&D submit an administrative modification application to PTI P0104489 within 90 days of receipt of this letter. The application should include the particulate emissions control efficiency of the water curtain as specified by the manufacturer.

3. **Finding:**

The following revisions should be made to Honda R&D's Air Services facility:

- a. K005 - the completion of initial installation date and the commencement of operation date need to be entered, the operating status should be changed from "not installed" to "operating," and the wet scrubber and dry filter should be replaced by a water curtain
- b. B038, B039, and B040 - egress points need to be entered
- c. B041 - the Bldg 13 RTO should be disassociated from this emissions unit and egress points need to be entered
- d. Bldg 14 RTO - egress points need to be entered

**Requested Action**

Ohio EPA requests that Honda R&D make the facility profile revisions listed in Finding 4 within 30 days of receipt of this letter.

4. **Finding:**

During the review of records maintained at the facility, CDO staff observed that records were not being maintained in accordance with the requirements of PTI P0105648, PTI 01-4470, PTI 01-08305, PTI P0104489, and the Title V P0083891 as follows.

- a. Honda R&D was not maintaining monthly records of rolling, 12-month summations of natural gas usage, gasoline usage in controlled dynamometers and gasoline usage in uncontrolled dynamometers. Sections C.1.d)(2) and C.2.d)(2) of PTI P0105648 state:

*"The permittee shall maintain monthly records of the following information facility wide for the emissions units listed in b)(5) above:*

- a. the total natural gas usage;*
  - b. the total gasoline usage in uncontrolled emissions units;*
  - c. the total gasoline usage in controlled emissions units;*
  - d. the rolling, 12-month summation of natural gas usage;*
  - e. the rolling, 12-month summation of gasoline in uncontrolled emissions units;*
  - f. the rolling, 12-month summation of gasoline in controlled emissions units; and*
  - g. the calculated CO emissions rate for all the emissions units as a rolling, 12-month summation."*
- b. Honda R&D's diesel fuel log spreadsheet listed the incorrect sulfur content and sulfur dioxide emission rates for their diesel fuel shipments.

The Additional Special Terms & Conditions Section of PTI 01-4470 states:

*"This facility shall maintain monthly records for sources B007 & B008 which shall contain the following information:*

- a) the date of receipt, amount received (gallons) and sulfur content (% by weight) for each shipment of fuel received for use."*

Section A.III.1. for emissions unit B007 of the Title V P0083891 states:

*"For each shipment of diesel fuel received for burning in this emissions unit, the permittee shall maintain records of the total quantity of diesel fuel received, the oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in lb/mmBtu."*

- c. Honda R&D was not maintaining daily records of the average hourly organic compound emission rates for emissions units K001, K002, K004, K005, P005 and P006.

Section A.III.2 for emissions units K001, K002 and K004 of the Title V P0083891 and Section A.III.2 of PTI 01-08305 for K004 state:

*"On any day when coating non-metal parts (including the coating of non-metal parts with powder coatings), the permittee shall collect and record the following information for each day for this emissions unit:*

- a. The company identification for each coating and cleanup material employed;*
- b. The number of gallons of each coating and cleanup material employed;*
- c. The organic compound content of each coating and cleanup material, in pounds per gallon;*
- d. The total organic compound emission rate for all cleanup materials, in pounds per day*
- e. the total potential (prior to applying the booth/oven "split") daily organic compound emission rate for all coatings in pounds per day;*
- f. the total potential (prior to applying the booth/oven "split") daily organic compound emission rate for all coatings multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition A.1.2.a of this permit), in pounds per day*
- g. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day (i.e., the sum of the figures from items (d) and (f));*
- h. The total number of hours the emissions unit was in operation; and*
- i. The average hourly organic compound emission rate for the coatings and cleanup materials, i.e., (g)/(h), in pounds per hour (average)."*

Section C.1.d)(2) of PTI P0104489 for K005 states:

*"The permittee shall collect and record the following information for each day for the coating operation:*

- a. the company identification for each photochemically reactive coating and cleanup material employed;*
- b. the number of gallons of each photochemically reactive coating and cleanup material employed;*
- c. the number of gallons hours each photochemically reactive coating and cleanup material employed;*
- d. the organic compound content of each photochemically reactive coating and cleanup material employed, in pounds per gallon;*
- e. the total organic compound emission rate for all photochemically reactive coating and cleanup material employed, in pounds per day; and*
- f. the average hourly OC emission rate from the material(s) applied in the emissions unit, i.e.,  $((b) \times (d)) / (c)$  in pounds per hour average."*

Section A.III.1 for emissions units P005 and P006 of the Title V P0083891 states:

*"The permittee shall collect and record the following information for each day for the oven when non-metal parts are coated:*

- a. the total potential (prior to applying the booth/over "split") uncontrolled daily organic compound emission rate for all coatings employed to non-metal parts, in the coating operating associated with this emissions unit; multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition A.1.2.a of this permit), in pounds per day*
- b. the total number of hours this emissions unit was in operation; and*
- c. the average hourly organic compound emission rate, i.e.,  $(a) / (b)$ , in pounds per hour (average)."*

### Violation

- a. Failure to maintain monthly records of rolling, 12-month summations of natural gas usage, gasoline usage in controlled dynamometers and gasoline usage in uncontrolled dynamometers is considered a violation of the terms and conditions of PTI P0105648. Violations of the terms and conditions of an issued PTI are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

*"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

- b. Failure to maintain accurate records of the sulfur content and sulfur dioxide emission rate of diesel fuel shipments is considered a violation of the terms and conditions of PTI 01-4470 and the Title V P0083891 as well as ORC 3704.05(C) and ORC 3704.05(J)(2), which states:

*"No person shall...[v]iolate any applicable requirement of a Title V permit or any permit condition...or filing requirement of the Title V permit program, any duty to allow or carry out inspection, entry, or monitoring activities..."*

- c. Failure to maintain daily records of the average hourly organic compound emission rates when coating non-metal parts for emissions units K001, K002, K004, P005 and P006 is considered a violation of the terms and conditions of the Title V P0083891 and PTI 01-08305 as well as ORC 3704.05(C) and ORC 3704.05(J)(2). Failure to maintain daily records of the average hourly organic compound emission rates when employing photochemically reactive materials in K005 is considered a violation of the terms and conditions of PTI P0104489 and ORC 3704.05(C).

### Requested Action

- a. During the compliance evaluation inspection on May 12, 2011, you added columns to Honda R&D's recordkeeping spreadsheet to calculate monthly rolling, 12-month summations of natural gas usage, gasoline usage in controlled dynamometers and gasoline usage in uncontrolled dynamometers. Honda R&D should continue to maintain this updated spreadsheet. No further action is requested at this time.
- b. On June 7, 2011, CDO staff received an e-mail from you with a revised diesel fuel log spreadsheet containing the correct calculations for sulfur content and sulfur dioxide emission rates. Honda R&D should continue to maintain this corrected spreadsheet. No further action is requested at this time.

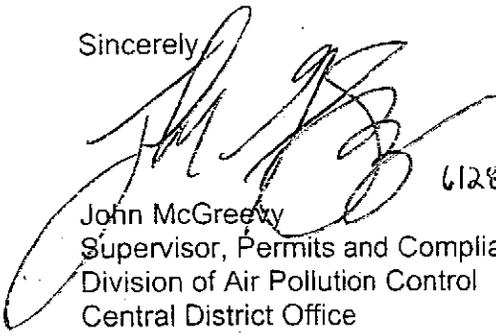
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- c. Honda R&D should immediately begin maintaining daily records of the average hourly organic compound emissions rates for emissions units K001, K002, K004, K005, P005 and P006 in accordance with applicable permit terms and conditions. Ohio EPA requests that Honda R&D submit a copy of these records to CDO, Division of Air Pollution Control, within 30 days of receipt of this letter.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the ORC Section 3704.06. Submittal of the above requested information, including records and reports, does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC Section 3704.06. The determination to pursue such penalties in this case will be made by Ohio EPA at a later date.

If you have any questions, please do not hesitate to contact Pam McCoy by phone at (614) 728-3810 or by e-mail at [pam.mccoy@epa.ohio.gov](mailto:pam.mccoy@epa.ohio.gov).

Sincerely



6/28/2011  
John McGreevy  
Supervisor, Permits and Compliance  
Division of Air Pollution Control  
Central District Office

c: Adam Ward, Manager, DAPC/CDO  
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