



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

4/27/2010

Certified Mail

Paul Huwer  
Honda of America Mfg., Inc. Anna Engine Plant  
12500 Meranda Road  
Anna, OH 45302-9699

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0575000174  
Permit Number: P0105716  
Permit Type: OAC Chapter 3745-31 Modification  
County: Shelby

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-SWDO; Indiana





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install**

for

Honda of America Mfg., Inc. Anna Engine Plant

Facility ID: 0575000174  
Permit Number: P0105716  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 4/27/2010  
Effective: 4/27/2010





Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc. Anna Engine Plant

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## Authorization

Facility ID: 0575000174  
Facility Description: Automobile manufacturing.  
Application Number(s): A0038581  
Permit Number: P0105716  
Permit Description: Modification of PTI 05-13639 to address increase in CO emissions that were discovered during stack test  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$1,000.00  
Issue Date: 4/27/2010  
Effective Date: 4/27/2010

This document constitutes issuance to:

Honda of America Mfg., Inc. Anna Engine Plant  
12500 Meranda Road  
Anna, OH 45302-9699

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402  
(937)285-6357

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0105716  
Permit Description: Modification of PTI 05-13639 to address increase in CO emissions that were discovered during stack test

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- Emissions Unit ID: P017**  
Company Equipment ID: Mold Making Line No. 1  
Superseded Permit Number: 05-13639  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P018**  
Company Equipment ID: Rough Finishing System  
Superseded Permit Number: 05-13639  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P020**  
Company Equipment ID: Extraction/Shakeout/Sand Sep. and Cooling Line 1  
Superseded Permit Number: 05-13639  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P075**  
Company Equipment ID: Continuous Shotblast System #1  
Superseded Permit Number: 05-13639  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P902**  
Company Equipment ID: Mold Pouring and Cooling Line 1  
Superseded Permit Number: 05-13639  
General Permit Category and Type: Not Applicable



## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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, 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 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.

#### **4. Monitoring and Related Record Keeping 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:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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, but not be limited to 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

- (2) 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 made to the Ohio EPA DAPC, Southwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. 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 Ohio EPA DAPC, Southwest District Office 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

- c) 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:
- (1) 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.
  - (2) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southwest District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

**9. Reporting 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 Ohio EPA DAPC, Southwest District Office.
- 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 Ohio EPA DAPC, Southwest District Office. 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 (i.e., postmarked) quarterly, 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.

## **B. Facility-Wide Terms and Conditions**

1. **All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:**
  - a) None.
2. **The following are facility-wide terms and conditions:**
  - a) This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B) and 3745-17-08(B) do not apply to the fugitive emissions from the affected emissions units at this facility.
  - b) The particulate emissions (PE) from baghouse BH-4 serving emissions units P020, P087 and P902 shall not exceed 0.005 grain/dry standard cubic foot (dscf) of the total exhaust gases.  
  
The PE from baghouse BH-5 serving emissions units P017, P910, and P901(tapping and charging) shall not exceed 0.005 grain/dscf of the total exhaust gases.  
  
The PE from baghouse BH-6 serving emissions units P018, P020 and P075 shall not exceed 0.005 grain/dscf of the total exhaust gases.  
  
The permittee reserves the right to direct the PE from any other existing or new emissions units to these baghouses with the understanding that emissions will not exceed 0.005 grain/dscf of the total exhaust gases and/or individual emission unit's permitted allowable emission limitation.  
  
This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to Ohio EPA within 30 days after the change(s) documenting the change(s). This information would include, but not limited to, the following: a description of which emissions units were redirected to which baghouse, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to OAC rule 3745-31-01.
  - c) This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to the Ohio EPA within thirty days after the change(s) documenting the change(s). This information would include, but not limited to, the following: a description of which emissions units were redirected to which bag house, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to OAC rule 3745-31-01.
  - d) This facility is an existing affected source classified as a large foundry in accordance with 40 CFR, Part 63, Subpart ZZZZZ: Iron and Steel Foundries Area Sources. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

## **C. Emissions Unit Terms and Conditions**



**1. P017, Mold Making Line No. 1**

**Operations, Property and/or Equipment Description:**

Mold Making Line No. 1

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The OC emissions from this emissions unit shall not exceed 8.1 lbs/hr from the application of mold release.  See Section b)(2)a., thru d., c)(4) and (5), d)(5) and(6), e)(1) and (2), f)(1)a., and f)(2), below.
b.	OAC rule 3745-31-05(D) (to avoid becoming a PSD major facility)	The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, shall not exceed 11.25 tons (PE)/ rolling, 12-month period.  The fugitive emissions from P017 shall not exceed 0.71 tons of PE/ rolling, 12-month period.  The OC emissions from this emissions unit shall not exceed 29.2 tons/ rolling, 12-month period.  See Section c)(1), (2), and (3), d)(1), (2), and (3), e)(1), f)(1)b., and f)(1)e., below.
c.	OAC rule 3745-21-07(G)(2)	See Section b)(2)e., c)(6), d)(4), and e)(1), below.
d.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.  See Section f)(1)f., below.
e.	OAC rule 3745-17-11(B)(1) Figure II curve P-1	The PE emissions shall not exceed 21.34 lbs per hour  See Section f)(1)c., below.
f.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See Sections b)(2)a., thru c., b)(2)f., c)(1) and (2), d)(1) thru (3) and (5), e)(1), f)(1)d., and f)(2), below.
g.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)g., below.
h.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)	The permittee shall comply with the applicable emission limitations(s) as specified in 40 CFR Part 63, Subpart ZZZZZ, (Iron and Steel Foundries Area Sources), in accordance with 40 CFR Parts 63.10895.  Should Subpart ZZZZZ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf) as a voluntary restriction as proposed by the permittee for purpose of constituting a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.
- b. This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
- c. Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control devise associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.

- d. The hourly OC emission limitations were established to reflect the maximum potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b(1)c., d)(3)g., d)(4)a., d)(4)b., d)(4)c., and d)(4)d., d)(4)e., d)(4)(f), and e)(1)f.

[OAC rule 3745-21-07]

- f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- g. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

- (1) The maximum operating hours for emissions units P017 shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.
- (2) The maximum amount of sand processed through emissions units P017 shall not exceed 394,623 tons per rolling, 12-month period.
- (3) The amount of mold release employed in this emission unit shall not exceed 14,400 gallons/ rolling, 12-month period.
- (4) The organic content of the mold release employed in this emission unit shall not exceed 4.05 pounds/gallon.

- (5) This emission unit shall employ mold binders that contain no volatile organic compounds.
  - (6) The permittee has agreed to use of non-photochemically reactive material in order to assure compliance with OAC rule 3745-21-07(G)(2).
  - (7) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
    - a. the hours that baghouse #5 was operated;
    - b. the particulate emissions (PE) rate from baghouse # 5, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
    - c. the monthly PE from baghouse #5, in tons, (the summation of:  $\{[("b" \times 72,948 \text{ acfm}) \times 60 \text{ mins/hr} \times (1\text{lb}/7,000)] \times "a" \} / 2,000 \text{ lbs/ton}$ ); and
    - d. the rolling, 12-month total PE from baghouse # 5. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("j") plus the total amount of PE for the 11 previous calendar months)
  - (2) The permittee shall maintain monthly records of the following information:
    - a. the amount of sand employed in emissions unit P017, in tons;
    - b. the rolling, 12-month total sand usage in emissions unit P017. The rolling, 12-month summation of the total sand employed (the total amount of sand employed for the current month ("a") plus the total amount of sand employed for the 11 previous calendar months);
    - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{sand usage "a"} \times 3.6 \text{ lbs of PE/ton of sand employed, from Fire SCC 304000350,}) \times (1 - \text{hooding capture efficiency (99.9\%, best engineering assumption)})] / 2000 \text{ lbs/ton}$ ); and
    - d. the rolling, 12-month total fugitive PE from P017. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ("n") plus the total amount of fugitive PE for the 11 previous calendar months).
  - (3) The permittee shall maintain monthly records of the following information:
    - a. the total operating hours;
    - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
    - c. the amount of mold release employed, in gallons employed;

- d. the organic content of each mold release employed, in pounds per gallon;
  - e. the monthly OC emissions from the use of mold release, in tons, (the summation of: ("c" x "d")/2,000 lbs/ton);
  - f. the rolling, 12-month total OC emissions from the use of mold release. The rolling, 12-month summation of the total amount of OC emissions (the total amount of OC emissions for the current month ("e") plus the total amount of OC emissions for the 11 previous calendar months); and
  - g. is the mold release "photochemically reactive" ("yes" or "no").
- (4) This facility shall maintain the following monthly records if any photochemically reactive materials are used in this emissions unit.
- a. if any material employed is by definition "Photochemically Reactive", the amount of each material employed, in gallons;
  - b. if any material employed is by definition "Photochemically Reactive", the organic compound content of each material employed, in lbs/gal;
  - c. if any material employed is by definition "Photochemically Reactive", the organic compound (OC) emissions of each material employed, in lbs of OC/day ("a" x "b");
  - d. if any material employed is by definition "Photochemically Reactive", the total OC emissions from all materials employed, in lbs of OC/day (sum of all "c");
  - e. if any material employed is by definition "Photochemically Reactive", the total number of hours this emission unit was operated, in hours/day; and
  - f. if any material employed is by definition "Photochemically Reactive", the estimated hourly OC emission rate, in lbs of OC/hr ("d/e").
- (5) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

- (7) All records required under section d) of this permit shall be maintained for no less than 5 years and shall be made available for review by the director, or his/her authorized representative upon request.
- (8) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month period OC emission limitation of 29.2 tons;
  - b. all exceedances of the combined rolling, 12-month period PE limitation of 11.25 tons from baghouse # 5, (emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and the charging and tapping of emissions unit P901, Cupola);
  - c. all exceedances of the rolling 12-month period sand usage of 394,623 tons per rolling 12-month period in emissions unit P017;
  - d. all exceedances of the rolling 12-month period fugitive PE limitation of 0.71 tons per rolling 12-month period from emissions unit P017;
  - e. all exceedances of the rolling, 12-month period 7,200 operation hour limitation;
  - f. an identification use of "photochemical reactive" mold release (parting spray); and/or
  - g. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semiannual written reports that:
- a. identify all days during which any visible PE were observed from any stack serving this emissions unit;
  - b. identify all days during which any visible fugitive PE were observed from any egress point (i.e., building windows, doors, roof monitors, etc...) serving this emissions unit; and
  - c. describe the corrective actions taken to eliminate the visible PE.

These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)

f) Testing Requirements

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

8.1 lb of OC emissions/hr

The hourly OC emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$HER = \mu \times OC$$

where

HER = Hourly emission rate, in lbs of OC/hr;

$\mu$  = Mold release usage rate, in gallons/hr ( 2 gallons/hr, from Honda data); and

OC = Organic Compound (OC) content of the mold release, in pounds of OC per gallon of mold release (4.05, from Honda data).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the understanding that the maximum hourly usage of mold release will not exceed 2 gallons per hour and the maximum OC content of the mold release employed would not exceed 4.05 lbs/gallon.

If required, the permittee shall demonstrate formulation data or USEPA Method 24 shall be used to determine the VOC content of each mold release employed.

- b. Emission Limitation:

29.2 tons OC/12-month rolling period, including fugitives.

The hourly OC emission limitation represent the emissions unit's potential to emit and was established by the following methodology:

$$\text{AER} = \text{Mu} \times \text{Oc}$$

Where:

AER = Annual Emission Rate, in tons per rolling 12-month period;

Mu = Mold release usage rate, in gallons/ rolling 12-month period (14,400), from Honda data); and

Oc = Organic Compound (OC) content of the mold release, in pounds of OC per gallon of mold release (4.05, from Honda data).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(3), of this permit.

c. Emission Limitation:

21.34 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

$$\text{AMR} = 0.5782 \times (\text{U to the power of } 0.6456)$$

Where:

AMR = Allowable Mass Emission Rate, in lbs/hr;

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000350, emission factor of , 3.6 lbs emitted/ton of sand multiplied by 74.3 tons of sand /hr maximum).

Emission calculation is based on the requirements of OAC rule 3745-17-11(B)(1) Figure II, curve P-1.

Applicable Compliance Method:

Compliance with the above limitations is based on the 74.3 tons of sand employed being the maximum potential sand usage in this emissions unit and emission testing demonstrating 0.005 grains/ dscf requirement.

d. Emission Limitation:

The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and the charging and tapping of emissions unit P901, Cupola, shall not exceed 11.25 tons (PE)/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$AER = [(Af \times Ef \times 60 \text{ mins/hr} \times Cf) \times Ho] / 2000$$

where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse # 5, in acfm, (72,948, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(1), of this permit.

e. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P017, shall not exceed 0.71 tons (PE)/ rolling 12-month period.

The fugitive PE rolling 12-month emission limitation is the total sum of the following equation:

$$FER = [(MSR \times Ef) \times (1-CAP)] / 2000\text{lbs/ton}$$

Where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;

MSR = Maximum sand usage rate, in tons, (394,623 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of sand, (3.6 lbs/ton of sand, Fire SCC 304000350); and

CAP = Assumed capture efficiency, in %, (99.9% (0.999), from data provided by Honda).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(2), of this permit.

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, from any baghouse stack or any roof vent serving this emission unit.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(6), of this permit.

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(2) The permittee shall conduct, or have conducted, emission testing for on any baghouse(s) that this emissions unit is controlled by to demonstrate compliance with the allowable PE limitations.

a. The emission testing shall be in accordance with the requirements of the Title V permit for this facility.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations.

i. PE: Methods 1-5 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emission units being controlled by the baghouse(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid



characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.



2. P018, Rough Finishing System

Operations, Property and/or Equipment Description:

Rough Finishing System

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (to avoid becoming a PSD major facility)	The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P018, emissions unit P075, Line 1 Shotblast, and emissions unit P020, Line 1 Didion, shall not exceed 12.15 tons (PE)/ rolling, 12-month period.  The fugitive emissions from P018 shall not exceed 0.62 tons of PE/ rolling, 12-month period.  See Sections b)(2)a., thru c., c)(1) and (2), d)(1), thru (4), e)(1) and (2), f)(1)b., f)(1)c., and f)(2), below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.  See Section f)(1)d., below.
c.	OAC rule 3745-17-11(B)(1) Figure II curve P-1	The PE emissions shall not exceed 23.7 lbs per hour.  See Section f)(1)a., below.
d.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See Sections b)(2)a., thru d., c)(1) and (2), d)(1) thru (3), e)(1) and (2), f)(1)b., and f)(2), below.
e.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)e., below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)	<p>The permittee shall comply with the applicable emission limitations(s) as specified in 40 CFR Part 63, Subpart ZZZZZ, (Iron and Steel Foundries Area Sources), in accordance with 40 CFR Parts 63.10895.</p> <p>Should Subpart ZZZZZ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This permit for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf) as a voluntary restriction as proposed by the permittee for purpose of constituting a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.
- b. This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
- c. Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control devise associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

- (1) The maximum operating hours for emissions units P018 shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.
- (2) The maximum amount of metal processed through emissions units P018 shall not exceed 72,900 tons per rolling 12-month period.
- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 6 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 6, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse #6, in tons, (the summation of:  $\{[("d" \times 78,719 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a"\} / 2,000 \text{ lbs/ton}$ );
  - f. the rolling, 12-month total PE from baghouse # 6. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months);
- (2) The permittee shall maintain monthly records of the following information:
  - a. the amount of metal processed in emissions unit P018, in tons;
  - b. the rolling, 12-month total metal processed in emissions unit P018. The rolling, 12-month summation of the total sand employed (the total amount of metal processed employed for the current month ("a") plus the total amount of metal processed employed for the 11 previous calendar months);
  - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{metal processed "a"} \times 17.0 \text{ lbs of PE/ton of metal processed, from Fire SCC 304000340,}) \times (1 - \text{hooding capture efficiency (99.9\%, best engineering assumption)})] / 2000 \text{ lbs/ton}$ ); and

- d. the rolling, 12-month total fugitive PE from P018. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ("c") plus the total amount of fugitive PE for the 11 previous calendar months).
- (3) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.
- The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.
- (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the control stack for this emissions unit. The presence or absence of any visible emissions shall be noted in an operational log. The permittee shall also note the following information in the operational log:
- a. the date, time observation was initiated, and the time observation was ended; and
  - b. the time any visible emissions were observed.
- (5) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the combined rolling, 12-month period PE limitation of 12.15 tons from baghouse # 6, (emissions from emissions unit P018, emissions unit P075, Line 1 Shotblast, and emissions unit P020, Line 1 Didion,);
  - b. all exceedances of the rolling 12-month period metal processed of 72,900 tons per rolling 12-month period in emissions unit P018;
  - c. all exceedances of the rolling 12-month period fugitive PE limitation of 0.62 tons per rolling 12-month period from emissions unit P018;
  - d. all exceedances of the rolling, 12-month period 7,200 operation hour limitation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit; and/or

- e. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semi-annual written reports that:

- a. identify all days that visible emissions from the baghouse exhaust serving this emissions unit were greater than 0% opacity during the 6 month period in which an excursion occurred.<sup>1</sup>

<sup>1</sup>. An excursion is defined in Section b)(1)e, of these terms and conditions.

Semi-annual deviation (excursion) reports shall be submitted by January 31<sup>st</sup> and July 31<sup>st</sup> of each calendar year and shall cover the previous 6 month period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

23.7 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

$AMR = 0.5782 \times (U \text{ to the power of } 0.6456)$

where:

AMR = Allowable Mass Emission Rate, in lbs/hr;

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000340, emission factor of , 17.0 lbs emitted/ton of metal multiplied by 18.5 tons of metal processed /hr maximum).

Emission calculation is based on the requirements of OAC rule 3745-17-11(B)(1) Figure II, curve P-1.

Applicable Compliance Method:

Compliance with the above limitations is based on the 18.5 tons of metal processed being the maximum potential process rate for this emissions unit and emission testing demonstrating 0.005 grains/ dscf requirement.

b. Emission Limitation:

The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P018, emissions unit P075, Line 1 Shotblast, and emissions unit P020, Line 1 Didion, shall not exceed 12.15 tons/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$AER = [(Af \times Ef \times 60 \text{ mins/hr} \times Cf) \times Ho] / 2000$$

where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse #6, in acfm, (78,719, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(1), of this permit.

c. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P018, shall not exceed 0.62 tons (PE)/ rolling 12-month period.

The fugitive PE rolling 12-month emission limitation is the total sum of the following equation:

$$FER = [(MSR \times Ef) \times (1-CAP)] / 2000\text{lbs/ton}$$

where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;

MSR = Maximum metal processed rate, in tons, (72,900 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of sand, (17.0 lbs/ton of metal charged, Fire SCC 304000340); and

CAP = Assumed capture efficiency, in %, (99.9% (0.999), from data provided by Honda).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(2), of this permit.

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, from any baghouse stack nor 20% opacity from any roof vent serving this emission unit.

Applicable Compliance Method:

In order to minimize redundant visible emission monitoring requirements, compliance with the above opacity limitation shall be assumed as long as this emissions unit is in compliance with its monitoring requirements, as outlined in this permit.

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(2) The permittee shall conduct, or have conducted, emission testing for on baghouse # 6 and all baghouses that this emissions unit is controlled by to demonstrate compliance with the allowable PE limitations.

- a. The emission testing shall be in accordance with the requirements of the Title V permit for this facility.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations.
  - i. PE: Methods 1-5 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emission units being controlled by the baghouse(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for



review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.



3. P020, Extraction/Shakeout/Sand Sep. and Cooling Line 1

Operations, Property and/or Equipment Description:

Extraction/Shakeout/Sand Sep. and Cooling Line 1

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The combined stacked Carbon Monoxide (CO) emissions from emissions units P020 and P902 shall not exceed 61.8 lbs./hr</p> <p>The combined stacked Organic Compound (OC) emissions from emissions units P020 and P902 shall not exceed 18.32 lbs of organic compound (OC) emissions/hr</p> <p>See Sections b)(2)a., thru d., d)(6), and (7), e)(1) and (2), f)(1)a., e., and g., and f)(2), below.</p>
b.	OAC rule 3745-31-05(D) (to avoid becoming PSD major facility)	<p>The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P020, emissions unit P075, Line 1 Shotblast, and emissions unit P018, Rough finishing system, shall not exceed 12.15 tons (PE)/ rolling 12-month period.</p> <p>The particulate emissions (PE) from baghouse # 4, which controls emissions from emissions unit P020, emissions unit P902, Autopour I Furnace, and emissions unit P087, Disc M/C, shall not exceed 11.53 tons (PE)/ rolling 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The fugitive emissions from P020 shall not exceed 0.92 tons of PE/ rolling 12-month period.</p> <p>The combined Carbon Monoxide (CO) from emissions units P020 and P902 shall not exceed 95.72 tons/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>The combined Organic Compound (OC) emissions from emissions units P020 and P902 shall not exceed 28.4 tons/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>See Sections c)(1), and (2), d)(1) thru d)(5), e)(1), f)(1)b., c., d., f., and h., below.</p>
c.	OAC rule 3745-17-07(A)(1)	<p>Visible PE emissions from any roof vent that emits emissions into the ambient air from this emission unit shall not exceed 20% opacity, as a 6-minute average.</p> <p>See Sections f)(1)i., below.</p>
d.	OAC rule 3745-17-11(B)(1) Figure II curve P-1	<p>The PE emissions shall not exceed 8.1 lbs per hour.</p> <p>See Section f)(1)a., below.</p>
e.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)	<p>The permittee shall comply with the applicable emission limitations(s) as specified in 40 CFR Part 63, Subpart ZZZZZ, (Iron and Steel Foundries Area Sources), in accordance with 40 CFR Parts 63.10895.</p> <p>Should Subpart ZZZZZ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This permit for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf) as a voluntary restriction as proposed by the permittee for purpose of constituting a

Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

- b. This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
  - c. Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control device associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.
  - d. The hourly OC and CO emission limitations were established to reflect the maximum potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- c) Operational Restrictions
- (1) The maximum operating hours for emissions units P020 shall not exceed 7,200, based upon a rolling, 12 month summation of the operating hours.
  - (2) The maximum amount of metal processed through emissions units P020 shall not exceed 57,320 tons per rolling 12-month period.
  - (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
    - a. the total operating hours;
    - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
    - c. the hours that baghouse # 6 was operated;
    - d. the particulate emissions (PE) rate from baghouse # 6, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
    - e. the monthly PE from baghouse #6, in tons, (the summation of:  $(\{[["d" \times 78,719 \text{ acfm}] \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a" \} / 2,000 \text{ lbs/ton})$ ); and
    - f. the rolling, 12-month total PE from baghouse # 6. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).

- (2) The permittee shall maintain monthly records of the following information:
- the hours that baghouse # 4 was operated;
  - the particulate emissions (PE) rate from baghouse # 4, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - the monthly PE from baghouse # 4, in tons, (the summation of:  $\{[(\text{"b"} \times 74,731 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times \text{"a"}\} / 2,000 \text{ lbs/ton}$ ); and
  - the rolling, 12-month total PE from baghouse # 4. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("c") plus the total amount of PE for the 11 previous calendar months).
- (3) The permittee shall maintain monthly records of the following information:
- the amount of metal processed in emissions unit P020, in tons; and
  - the rolling, 12-month total metal processed in emissions unit P020. The rolling, 12-month summation of the total metal employed (the total amount of metal employed for the current month ("a") plus the total amount of sand employed for the 11 previous calendar months).
- (4) The permittee shall maintain monthly records of the following information:
- the carbon monoxide (CO) rate, in pounds per ton of metal processed, 3.34 lbs/ton of metal or result from most recent stack test;
  - the monthly CO emissions, in tons, (the summation of:  $\{(\text{metal processed "Section d)(3).a."} \times \text{"a"}\} / 2000 \text{ lbs/ton}$ ); and
  - the rolling, 12-month total CO emissions from P020 & P902. The rolling, 12-month summation of the total CO emissions (the total amount of CO emitted for the current month ("b") plus the total amount of CO emitted for the 11 previous calendar months).
- (5) The permittee shall maintain monthly records of the following information:
- the organic compound (OC) rate, in pounds per ton of metal processed, 0.99 lbs/ton of metal or result from most recent stack test;
  - the monthly OC emissions, in tons, (the summation of:  $\{(\text{metal processed "Section d)(3).a."} \times \text{"a"}\} + [(\text{metal processed "Section d)(3).a."} \times \text{"a"}] \times ((\text{"a"} \times 1/99.0\%) - \text{"a"})\} / 2000 \text{ lbs/ton}$ ); and
  - the rolling, 12-month total OC emissions from P020 & P902. The rolling, 12-month summation of the total OC emissions (the total amount of OC emitted for the current month ("b") plus the total amount of OC emitted for the 11 previous calendar months).
- (6) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation.

The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

- (7) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (ie., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operational log. If visible emissions are observed, the permittee shall also note the following in the operational log;
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

- (8) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the combined rolling, 12-month period PE limitation of 12.15 tons from baghouse # 6, (emissions from emissions unit P018, emissions unit P075, Line 1 Shotblast, and emissions unit P020, Line 1 Didion,);
  - b. all exceedances of the combined rolling, 12-month period PE limitation of 11.53 tons from baghouse # 4, (emissions from emissions unit emissions unit P020, emissions unit P902, Autopour I Furnace, and emissions unit P087, Disc M/C.);
  - c. all exceedances of the rolling 12-month period metal processed of 57,320 tons, in emissions unit P020;
  - d. all exceedances of the rolling, 12-month period 7,200 operation hour limitation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit; and/or
  - e. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)].

- (2) The permittee shall submit semiannual written reports that:
- a. identify all days during which any visible PE were observed from any stack serving this emissions unit;
  - b. identify all days during which any visible fugitive PE were observed from any egress point (i.e., building windows, doors, roof monitors, etc...) serving this emissions unit; and
  - c. describe the corrective actions taken to eliminate the visible PE.

These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

8.1 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

$AMR = 0.5782 \times (U \text{ to the power of } 0.6456)$

where:

AMR = Allowable Mass Emission Rate, in lbs/hr;

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000331, emission factor of , 3.2 lbs emitted/ton of metal processed multiplied by 18.5 tons of metal processed /hr maximum).

Emission calculation is based on the requirements of OAC rule 3745-17-11(B)(1) Figure II, curve P-1.

Applicable Compliance Method:

Compliance with the above limitations is based on the 87.5 tons of metal processed being the maximum potential process rate for this emissions unit and emission testing demonstrating 0.005 grains/ dscf requirement.

b. Emission Limitation:

The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P020, emissions unit P075, Line 1 Shotblast, and emissions unit P018, Rough Finish, shall not exceed 12.15 tons/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$AER = [(Af \times Ef \times 60 \text{ mins/hr} \times Cf) \times Ho] / 2000$$

where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse #6, in acfm, (78,719, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(1), of this permit.

c. Emission Limitation:

The particulate emissions (PE) from baghouse # 4, which controls emissions from this emissions unit shall not exceed 11.53 tons/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$AER = [(Af \times Ef \times 60 \text{ mins/hr} \times Cf) \times Ho] / 2000$$

Where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse #4, in acfm, (74,731, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(2), of this permit.

d. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P020, shall not exceed 0.92 tons (PE)/ rolling 12-month period.

The fugitive PE rolling 12-month emission limitation is the total sum of the following equation:

$$FER = [(MSR \times Ef) \times (1-CAP)] / 2000\text{lbs/ton}$$

where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;

MSR = Maximum metal processed rate, in tons, (57,320 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of metal, (3.2 lbs/ton of metal, Fire SCC 304000340); and

CAP = Assumed capture efficiency, in %, (99.0% (0.990)), from data provided by Honda).

Applicable Compliance Method:

Compliance is assumed based on the maintenance and upkeep of the hooding and duct work emissions unit and the throughput records in section d)(3) of this permit.

e. Emission Limitation:

61.8 lb of CO stacked emissions/hr, combined emissions from P020 and P902

The hourly CO emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$HER = COER \times MMR$$

where:

HER = Hourly emission rate, in lbs of CO/hr;

COER = Emission factor, in lbs/ton of metal processed, (3.34 lbs/ton processed, Honda's Emission Tests 2009); and

MMR = Maximum tons of metal processed per hour, (18.5 tons/hr, from Honda's Emission Activity Category form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the understanding that the maximum hourly metal processed will not exceed 18.5 tons/hr.

f. Emission Limitation:

95.72 tons of CO/ 12-month period, based on a rolling, 12-month summation, including fugitives, combined from P020 and P902.

Applicable Compliance Method:

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$AER = [(COEF \times MMR) + \{((COER \times (1/CAP)) - COER) \times MMR\}] / 2000$$

where:

AER = Annual Emission Rate;

COER = Carbon monoxide Emission Rate (3.34 lbs/ton processed, Honda's Emission Test 2000);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.0%, (0.990)); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(4), of this permit.

g. Emission Limitation:

18.32 lbs of OC stacked emissions/hr, combined from P020 and P902.

The hourly OC emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$HER = COER \times MMR$$

Where:



HER = Hourly Emission Rate, in lbs of OC/hr;

OCER = Emission factor, in lbs/ton of metal processed, (0.99 lbs/ton processed, Honda's Emission Tests 2000); and

MMR = Maximum tons of metal processed per hour, (18.5 tons/hr, from Honda's Emission Activity Category form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the understanding that the maximum hourly metal processed will not exceed 18.5 tons/hr.

h. Emission Limitation:

28.4 tons of OC/ 12-month period, based on a rolling, 12-month summation, including fugitives, combined from P020 and P902.

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$AER = [(OCEF \times MMR) + ( \{ [(OCER \times (1/CAP)) - OCER] \times MMR \} ) / 2000$$

Where:

AER = annual emission rate;

OCER = Organic Compound Emission Rate, (0.99 lbs/ton processed, Honda's Emission Test 2009);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.0%, (0.990)); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(5), of this permit.

i. Emission Limitation:

Visible PE shall not exceed opacity, as a 6-minute average, from any baghouse stack nor 20% opacity from any roof vent serving this emission unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- (2) The permittee shall conduct, or have conducted, emission testing on the baghouse vents to demonstrate compliance with the above combined allowable particulate emission limitations from this emission unit as well as the other emission units whose captures particulate emissions are vented to baghouses BH-4 and BH-6 and the CO emissions from this emission unit.
- a. The emission testing shall be in accordance with the requirements of the Title V permit for this facility.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable CO emission limitations.
  - c. The emission testing shall be conducted to demonstrate compliance with the particulate emissions rate limitation of 0.005 grains/dscf, from any dust collectors or stacks associated with this emissions unit.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations.
    - i. PE: Methods 1-5 of 40 CFR Part 60, Appendix A
    - ii. CO: Methods 1-4, and 10 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.



**4. P075, Continuous Shotblast System #1**

**Operations, Property and/or Equipment Description:**

Continuous Shotblast System #1

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (to avoid becoming PSD major facility)	The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P075, emissions unit P018, Rough Finish, and emissions unit P020, Line 1 Didion, shall not exceed 12.15 tons (PE)/ rolling 12-month period.  The fugitive emissions from P075 shall not exceed 0.52 tons of PE/ rolling 12-month period.  See Sections b)(2)a. thru c., c)(1) and (2), d)(1), thru (4), e)(1) and (2), f)(1)b. and c., and f)(2), below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.  See Sections f)(1)d., below.
c.	OAC rule 3745-17-11(B)(1) Figure II curve P-1	The PE emissions shall not exceed 24.54 lbs per hour.  See Sections f)(1)d. and f)(2), below.
d.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See Sections b)(2)a., thru d., c)(1) and (2), d)(1) thru (3), e)(1) and (2), f)(1)b., and f)(2), below.
e.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)e., below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)	<p>The permittee shall comply with the applicable emission limitations(s) as specified in 40 CFR Part 63, Subpart ZZZZZ, (Iron and Steel Foundries Area Sources), in accordance with 40 CFR Parts 63.10895.</p> <p>Should Subpart ZZZZZ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This permit for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf) as a voluntary restriction as proposed by the permittee for purpose of constituting a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.
- b. This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
- c. Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control devise associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- e. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

- (1) The maximum operating hours for emissions units P075 shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.
- (2) The maximum amount of metal processed through emissions units P075 shall not exceed 60,627 tons per rolling 12-month period.
- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 6 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 6, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse #6, in tons, (the summation of:  $\{[["d" \times 78,719 \text{ acfm}] \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a" \} / 2,000 \text{ lbs/ton}$ ); and
  - f. the rolling, 12-month total PE from baghouse # 6. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
- (2) The permittee shall maintain monthly records of the following information:
  - a. the amount of metal processed in emissions unit P075, in tons;
  - b. the rolling, 12-month total metal processed in emissions unit P075. The rolling, 12-month summation of the total metal employed (the total amount of metal employed for the current month ( "a") plus the total amount of metal employed for the 11 previous calendar months);
  - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{metal processed "a" } \times 17.0 \text{ lbs of PE/ton of metal employed, from Fire SCC 304000340,}) \times (1\text{-hooding capture efficiency ( } 99.0\%), \text{ best engineering assumption})] / 2000 \text{ lbs/ton}\}$ ; and

- d. the rolling, 12-month total fugitive PE from P075. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ( "c") plus the total amount of fugitive PE for the 11 previous calendar months).
- (3) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.
  - (4) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the control stack for this emissions unit. The presence or absence of any visible emissions shall be noted in an operational log. The permittee shall also note the following information in the operational log:
    - a. the date, time observation was initiated, and the time observation was ended;
    - b. the time any visible emissions were observed; and
    - c. any corrective actions that are taken to eliminate any visible emissions that are observed.
  - (5) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. all exceedances of the combined rolling, 12-month period PE limitation of 12.15 tons from baghouse # 6, (emissions from emissions unit P018, emissions unit P075, Line 1 Shotblast, and emissions unit P020, Line 1 Didion,);
    - b. all exceedances of the rolling 12-month period metal processed of 60,627 tons per rolling 12-month period in emissions unit P075;
    - c. all exceedances of the rolling 12-month period fugitive PE limitation of 0.52 tons per rolling 12-month period from emissions unit P075;
    - d. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and/or

- e. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semi-annual written reports that:
  - a. identify all weeks that visible emissions were observed from the baghouse exhaust serving this emissions unit; and
  - b. any corrective actions that were taken to eliminate the observed emissions.

Semi-annual deviation (excursion) reports shall be submitted by January 31<sup>st</sup> and July 31<sup>st</sup> of each calendar year and shall cover the previous 6 month period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) **Testing Requirements**

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

24.54 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

$$HER = 0.5782 \times (U \text{ to the power of } 0.6458)$$

Where:

HER = particulate emissions, in lbs/hr;

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000340, emission factor of , 17.0 lbs emitted/ton processed multiplied by 19.5 tons/hr maximum production).

Emission calculation is based on the requirements of OAC rule 3745-17-11(B)(1) Figure II, curve P-1.

Applicable Compliance Method:

Compliance with the above limitations is based on the 19.5 tons of metal processed being the maximum potential process rate for this emissions unit and emission testing demonstrating 0.005 grains/ dscf requirement.

b. Emission Limitation:

The particulate emissions (PE) from baghouse # 6, which controls emissions from emissions unit P075, emissions unit P018, Rough Finish, and emissions unit P020, Line 1 Didion, shall not exceed 12.15 tons/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$AER = [(Af \times Ef \times 60 \text{ mins/hr} \times Cf) \times Ho] / 2000$$

Where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse-#6, in acfm, (78,719, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(1), of this permit.

c. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P075, shall not exceed 0.52 tons (PE)/ rolling 12-month period.

The fugitive PE rolling 12-month emission limitation is the total sum of the following equation:

$$FER = [(MSR \times Ef) \times (1-CAP)] / 2000\text{lbs/ton}$$

Where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;

MSR = Maximum metal processed rate, in tons, (60,627 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of metal, (17.0 lbs/ton of metal charged, Fire SCC 304000340); and

CAP = Assumed capture efficiency, in %, (99.9% (0.999), from data provided by Honda).

Applicable Compliance Method:

Compliance is based on the maintenance and upkeep of the hooding and duct work of this emissions unit and the recordkeeping under section d)(2), of this permit.

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, from any baghouse stack nor 20% opacity from any roof vent serving this emission unit.

Applicable Compliance Method:

Compliance will be based on recordkeeping in section d)(4) and corrective actions taken to eliminate any visible emissions that observed.

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(2) The permittee shall conduct, or have conducted, emission testing for on any and all baghouses that this emissions unit is controlled by to demonstrate compliance with the allowable PE limitations.

a. The emission testing shall be in accordance with the requirements of the Title V permit for this facility.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations.

i. PE: Methods 1-5 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emission units being controlled by the baghouse(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).



Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) Miscellaneous Requirements

(1) None.



5. P902, Mold Pouring and Cooling Line 1

Operations, Property and/or Equipment Description:

Mold Pouring and Cooling Line 1

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The combined stacked Carbon Monoxide (CO) emissions from emissions units P020 and P902 shall not exceed 61.8 lbs./hr</p> <p>The combined stacked Organic Compound (OC) emissions from emissions units P020 and P902 shall not exceed 18.32 lbs of organic compound (OC) emissions/hr</p> <p>See Section b)(2)a. thru d., d)(5) and (6), e)(1) and (2), f)(1)d. and f., and f)(2), below.</p>
b.	OAC rule 3745-31-05(D) (to avoid becoming a PSD major facility)	<p>The particulate emissions (PE) from baghouse # 4, which controls emissions from emissions unit P902, emissions unit P020, Line I Didion, and emissions unit P087, Disc M/C, shall not exceed 11.53 tons (PE)/ rolling 12-month period.</p> <p>The combined Carbon Monoxide (CO) from emissions units P020 and P902 shall not exceed 95.72 tons/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>The combined Organic Compound (OC) emissions from emissions units P020 and P902 shall not exceed 28.4 tons/ 12-</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>month period, based on a rolling, 12-month summation, including fugitives..</p> <p>1.46 tons of Nitrogen Oxides (NOx)/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>0.97 tons of Sulfur Dioxide (SO2)/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>The fugitive emissions from P902 shall not exceed 1.20 tons of PE/ rolling 12-month period.</p> <p>See Sections c)(1) and c)(2), d)(1) thru (4), e)(1), f)(1)b., c., e., g., h. and i., below.</p>
c.	OAC rule 3745-21-08	The CO limitations specified by this rule is less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3)
d.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any roof vent that emits emissions into the ambient air from this emission unit shall not exceed 20% opacity, as a 6-minute average.
e.	OAC rule 3745-17-11(B)(1) Figure II curve P-1	The PE emissions shall not exceed 9.6 lbs per hour
f.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	See Sections b)(2)a., thru c., and e., c)(1) and (2), d)(1), (2) and (5), e)(1) and (2), f)(1)b., and f)(2), below.
g.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)f., below.
h.	40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906)	<p>The permittee shall comply with the applicable emission limitations(s) as specified in 40 CFR Part 63, Subpart ZZZZZ, (Iron and Steel Foundries Area Sources), in accordance with 40 CFR Parts 63.10895.</p> <p>Should Subpart ZZZZZ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. This permit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf) as a voluntary restriction as proposed by the permittee for purpose of constituting a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.
- b. This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
- c. Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control device associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.
- d. The hourly CO emission limitation was established to reflect the maximum potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- f. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) emissions from this emissions unit since the potential emissions are less than ten tons per year.

c) Operational Restrictions

- (1) The maximum operating hours of this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.
- (2) The maximum amount of metal processed through this emissions unit shall not exceed 57,320 tons per rolling 12-month, period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
- the total operating hours;
  - the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - the hours that baghouse # 4 was operated;
  - the particulate emissions (PE) rate from baghouse # 4, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - the monthly PE from baghouse # 4, in tons, (the summation of:  $\{[("d" \times 74,731 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a" \} / 2,000 \text{ lbs/ton}$ ); and
  - the rolling, 12-month total PE from baghouse # 4. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
- (2) The permittee shall maintain monthly records of the following information:
- the amount of metal processed in emissions unit P902, in tons; and
  - the rolling, 12-month total metal processed in emissions unit P902. The rolling, 12-month summation of the total metal employed (the total amount of metal employed for the current month ("a") plus the total amount of metal employed for the 11 previous calendar months).
- (3) The permittee shall maintain monthly records of the following information:
- the carbon monoxide (CO) rate, in pounds per ton of metal processed, 3.34 lbs/ton of metal or result from most recent stack test;
  - the monthly CO emissions, in tons, (the summation of:  $\{(\text{metal processed "Section d)(2)a."} \times "a") / 2000 \text{ lbs/ton}\}$ ; and
  - the rolling, 12-month total fugitive CO emissions from P020 & P902. The rolling, 12-month summation of the total CO emissions (the total amount of CO emitted for the current month ("b") plus the total amount of CO emitted for the 11 previous calendar months).
- (4) The permittee shall maintain monthly records of the following information:
- the organic compound (OC) rate, in pounds per ton of metal processed, 0.99 lbs/ton of metal or result from most recent stack test;

- b. the monthly OC emissions, in tons, (the summation of: {(metal processed "Section d)(2)a." x "a") / 2000 lbs/ton}; and
  - c. the rolling, 12-month total fugitive OC emissions from P020 & P902. The rolling, 12-month summation of the total OC emissions (the total amount of OC emitted for the current month ("b") plus the total amount of OC emitted for the 11 previous calendar months).
- (5) The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.
- The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit is in operation. The monitoring equipment shall be calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.
- (6) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the control stack for this emissions unit. The presence or absence of any visible emissions shall be noted in an operational log. The permittee shall also note the following information in the operational log:
- a. the date, time observation was initiated, and the time observation was ended;
  - b. the time any visible emissions were observed; and
  - c. any corrective actions that are taken to eliminate any visible emissions that are observed.
- (7) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. all exceedances of the rolling, 12-month period CO emission limitation of 95.72 tons, including fugitives;
    - b. all exceedances of the rolling, 12-month period OC emission limitation of 28.37 tons;
    - c. all exceedances of the combined rolling, 12-month period PE limitation of 11.53 tons from baghouse # 5, (emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and the charging and tapping of emissions unit P901, Cupola);

- d. all exceedances of the rolling 12-month period metal processed of 57,320 tons per rolling 12-month period in emissions unit P902;;
- e. all exceedances of the rolling, 12-month period 7,200 operation hour limitation;
- f. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semi-annual written reports that:
  - a. identify all weeks that visible emissions were observed from the baghouse exhaust serving this emissions unit; and
  - b. any corrective actions that were taken to eliminate the observed emissions.

Semi-annual deviation (excursion) reports shall be submitted by January 31<sup>st</sup> and July 31<sup>st</sup> of each calendar year and shall cover the previous 6 month period.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

f) **Testing Requirements**

- (1) Compliance with the emission limitation(s) and operational restriction specified in Sections b)(1) and b)(2) shall be determined in accordance with the following methods:

- a. Emission Limitation:

9.6 lbs of PE/hr

The hourly emission limitation was established and based on OAC rule 3745-17-11(B)(1) Figure II curve P-2, equation (b):

$$AMR = 0.5782 \times (U^{0.6456})$$

Where:

AMR = Allowable Mass Emission Rate, in lbs/hr;

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000318, emission factor of, 4.2 lbs emitted/ton of metal processed multiplied by 18.5 tons of metal processed /hr maximum).

Emission calculation is based on the requirements of OAC rule 3745-17-11(B)(1) Figure II, curve P-1.

Applicable Compliance Method:

Compliance with the above limitations is based on the 18.5 tons of metal processed being the maximum potential process rate for this emissions unit.

b. Emission Limitation:

The particulate emissions (PE) from baghouse # 4, which controls emissions from this emissions unit shall not exceed 11.53 tons/ rolling 12-month period.

The combined rolling 12-month emission limitation is the total sum of the following equation for all of the above listed emissions units:

$$\text{AER} = [(\text{Af} \times \text{Ef} \times 60 \text{ mins/hr} \times \text{Cf}) \times \text{Ho}] / 2000$$

Where:

AER = Particulate emissions, in tons per rolling 12 month period;

Af = Maximum Air Flow from Baghouse #4, in acfm, (74,731, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

Cf = Conversion factor, (1 lbs/7,000 grains); and

Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(1), of this permit.

c. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P902, shall not exceed 1.20 tons (PE)/ rolling 12-month period.

The fugitive PE rolling 12-month emission limitation is the total sum of the following equation:

$$\text{FER} = [(\text{MSR} \times \text{Ef}) \times (1-\text{CAP})] / 2000\text{lbs/ton}$$

Where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;

MSR = Maximum metal processed rate, in tons, (57,320 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of sand, (4.2 lbs/ton of metal, Fire SCC 304000318); and

CAP = Assumed capture efficiency, in %, (99.0% (0.990)), from data provided by Honda).

Applicable Compliance Method:

Compliance is assumed based on the maintenance and upkeep of the hooding and duct work emissions unit and the throughput records in section d)(2) of this permit.

d. Emission Limitation:

61.8 lb of CO stacked emissions/hr, combined emissions from P020 and P902

The hourly CO emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{HER} = \text{COER} \times \text{MMR}$$

where:

HER = Hourly emission rate, in lbs of CO/hr;

COER = Emission factor, in lbs/ton of metal processed, (3.34 lbs/ton processed, Honda's Emission Tests 2009); and

MMR = Maximum tons of metal processed per hour, (18.5 tons/hr, from Honda's Emission Activity Category form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the understanding that the maximum hourly metal processed will not exceed 18.5 tons/hr.

e. Emission Limitation:

95.72 tons of CO/ 12-month period, based on a rolling, 12-month summation, including fugitives, combined from P020 and P902.

Applicable Compliance Method:

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{AER} = (\text{COEF} \times \text{MMR}) / 2000$$

where:

AER = Annual Emission Rate;

COER = Carbon monoxide Emission Rate (3.34 lbs/ton processed, Honda's Emission Test 2000);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.0%, (0.990)); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(4), of this permit.

f. Emission Limitation:

18.32 lbs of OC stacked emissions/hr, combined from P020 and P902.

The hourly OC emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$HER = COER \times MMR$

Where:

HER = Hourly Emission Rate, in lbs of OC/hr;

OCER = Emission factor, in lbs/ton of metal processed, (0.99 lbs/ton processed, Honda's Emission Tests 2000); and

MMR = Maximum tons of metal processed per hour, (18.5 tons/hr, from Honda's Emission Activity Category form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the understanding that the maximum hourly metal processed will not exceed 18.5 tons/hr.

g. Emission Limitation:

28.4 tons of OC/ 12-month period, based on a rolling, 12-month summation, including fugitives, combined from P020 and P902.

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$AER = (OCEF \times MMR)/2000$

Where:

AER = annual emission rate;

OCER = Organic Compound Emission Rate, (0.99 lbs/ton processed, Honda's Emission Test 2009); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(5), of this permit.

h. Emission Limitation:

1.42 tons of Nitrogen Oxides (NO<sub>x</sub>)/ 12-month period, based on a rolling, 12-month summation, including fugitives.

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$AER = (NOXER \times MMR) / 2000$$

Where:

AER = annual emission rate;

NOXER = Nitrogen Oxide Emission Rate, (0.05 lbs/ton processed, Honda's Emission Test 2002);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of, 99.0% (0.990)); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements to assure the rolling 12-month metal processed through this emissions unit does not exceed 57,320 tons.

i. Emission Limitation:

0.85 tons of Sulfur Dioxide (SO<sub>2</sub>)/ 12-month period, based on a rolling, 12-month summation, including fugitives.

The annual emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$\text{AER} = [(\text{SO}_2\text{EF} \times \text{MMR}) + \{(\text{SO}_2\text{ER} \times (1-\text{CAP})) - \text{SO}_2\text{ER}\} \times \text{MMR}] / 2000$$

Where:

AER = annual emission rate;

SO<sub>2</sub>ER = SO<sub>2</sub> Emission Rate, (0.03 lbs/ton processed, Honda's Emission Test 2000);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.0%, (0.990)); and

MMR = Maximum tons processed per 12-months (57,320, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements to assure the rolling 12-month metal processed through this emissions unit does not exceed 57,320 tons.

j. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, from any baghouse stack nor 20% opacity from any roof vent serving this emission unit.

Applicable Compliance Method:

Compliance will be based on recordkeeping in section d)(6) and corrective actions taken to eliminate any visible emissions that observed.

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(2) The permittee shall conduct, or have conducted, emission tests on the baghouse vents to demonstrate compliance with the above combined allowable particulate emission limitations from this emission unit as well as the other emission units whose captures particulate emissions are vented to baghouses BH-4 and the CO emissions from this emission unit.

- a. The emission testing shall be in accordance with the requirements of the Title V permit for this facility.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable CO emission limitations.
- c. The emission testing shall be conducted to demonstrate compliance with the particulate emissions rate limitation of 0.005 grains/dscf, from any dust collectors or stacks associated with this emissions unit.

- d. The emission testing shall be conducted to demonstrate compliance with the allowable OC emission limitations.
- e. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations:
  - i. PE: Methods 1-5 of 40 CFR Part 60, Appendix A;
  - ii. CO: Methods 1-4, and 10, of 40 CFR Part 60, Appendix A; and
  - iii. OC: Methods 1-4, 18, or 25 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southwest District Office.

- (3) See 40 CFR Part 63, Subpart ZZZZZ (40 CFR 63.10880-10906).

g) **Miscellaneous Requirements**

- (1) None.