Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/28/2011

Certified Mail

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

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0575000174
Permit Number: P0109120
Permit Type: Initial Installation
County: Shelby

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Sidney Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *-Via E-Mail Notification*
Ohio EPA-SWDO; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination (In order to assure the facility does not trigger PSD thresholds)

2. Source Description:

   This permit includes: L012 CVT Parts Washer #1, Washer & Ancillary Equipment, P135 Carburizing Furnace #1, Pre-Heater, Furnace, Endo Generator, Quench &Misc, P136 Carburizing Furnace #2, Pre-Heater, Furnace, Endo Generator, Quench & Misc., and P137 Carburizing Furnace #3, Pre-Heater, Furnace, Endo Generator, Quench & Misc.

   BAT short term limit is based on the potential hourly and compliance with existing rules. The federally enforceable annual limitations are based on 7,200 hours of operations during 12 month rolling period.

3. Facility Emissions and Attainment Status:

   The facility is an engine plant which also makes some brake parts. It is a major Title V facility for particulate and CO. It is located in Shelby County which is attainment for all criteria pollutants.

   USEPA's Tailoring Rule for Greenhouse Gas Emissions (GHGs) was addressed. Step 2 of the Tailoring Rule (sources with an application on or after July 1, 2011) requires a two part test for all new source installations to determine if the source is major under PSD for GHGs. The calculations for the carburizing furnaces show that the sources each are over the mass based CO2 threshold and above the 100,000 tpy CO2e threshold. Therefore Honda is requesting to limit their CO2 emissions to avoid being PSD for GHGs via a synthetic minor restriction under OAC 3745-31-05(D).

4. Source Emissions:

   The three carburizing furnaces, each, have potential emissions of less than 10 tons per year of all regulated pollutants and will trigger the SB265's "controlled" emissions < 10 tons exemption from BAT. Since then, the Federal Courts decided that until Ohio SIP is revised, BAT is required for less than 10 ton "controlled" emissions units. Please note that due to the fact that BAT is based on potential hourly and the annual is based on a rolling limit under OAC rule 3745-31-05(D), if the OHIO SIP is approved by the Federal EPA, there will be no need to modify these emissions units permit requirements.

5. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
PM	0.42
NOx	10.20
CO	26.34
OC	12.67
VOC	12.52
SOx	0.36
CO2e	7,848.00

PUBLIC NOTICE
12/28/2011 Issuance of Draft Air Pollution Permit-To-Install

Honda of America Mfg., Inc. Anna Engine Plant
12500 Meranda Road,
Anna, OH 45302-9699
Shelby County
FACILITY DESC.: Other Motor Vehicle Electrical and Electronic Equipment Manufacturing
PERMIT #: P0109120
PERMIT TYPE: Initial Installation
PERMIT DESC: New installation of L012 CVT Parts Washer #1, Washer & Ancillary Equipment, P135 Carburizing Furnace #1, Pre-Heater, Furnace, Endo Generator, Quench & Misc., P136 Carburizing Furnace #2, Pre-Heater, Furnace, Endo Generator, Quench & Misc., and P137 Carburizing Furnace #3, Pre-Heater, Furnace, Endo Generator, Quench & Misc.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357

Ohio | Environmental Protection Agency

DRAFT

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

Facility ID:	0575000174
Permit Number:	P0109120
Permit Type:	Initial Installation
Issued:	12/28/2011
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

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): A0042762
Permit Number: P0109120
Permit Description: New installation of L012 CVT Parts Washer #1, Washer & Ancillary Equipment, P135 Carburizing Furnace #1, Pre-Heater, Furnace, Endo Generator, Quench & Misc., P136 Carburizing Furnace #2, Pre-Heater, Furnace, Endo Generator, Quench & Misc., and P137 Carburizing Furnace #3, Pre-Heater, Furnace, Endo Generator, Quench & Misc.
Permit Type: Initial Installation
Permit Fee: $1,700.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/28/2011
Effective Date: To be entered upon final issuance

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109120
Permit Description: New installation of L012 CVT Parts Washer #1, Washer & Ancillary Equipment, P135 Carburizing Furnace #1, Pre-Heater, Furnace, Endo Generator, Quench & Misc., P136 Carburizing Furnace #2, Pre-Heater, Furnace, Endo Generator, Quench & Misc., and P137 Carburizing Furnace #3, Pre-Heater, Furnace, Endo Generator, Quench & Misc.

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

Emissions Unit ID:	**L012**
Company Equipment ID:	P138 CVT Parts Washer #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Carburizing Furnaces 1 -3 2012

Emissions Unit ID:	**P135**
Company Equipment ID:	P135 Carburizing Furnace #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P136**
Company Equipment ID:	P136 Carburizing Furnace #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P137**
Company Equipment ID:	P137 Carburizing Furnace #3
Superseded Permit Number:	
General Permit Category andType:	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 of 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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, andreportingrequirements 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 enteredupon 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.

C. Emissions Unit Terms and Conditions

1. L012, P138 CVT Parts Washer #1

Operations, Property and/or Equipment Description:

L012 CVT Parts Washer #1, Washer & Ancillary Equipment

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 operation(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 are identified below. 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), as effective 11/30/01	The maximum volatile organic compound (VOC) emissions from this emissions unit shall not exceed 6.7 pounds per hour. The requirements of this rule include compliance with the requirements of OAC rules 3745-21-09 and 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	See section b)(2)d., below.
c.	OAC rule 3745-21-09(O)	See sections b)(2)b., and c)(1), below.
d.	OAC rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

a. The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with the hourly emission limitation.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01]

b. The conveyorized degreaser shall retain the parts in this emissions unit for a sufficient amount of time to prevent cleaned parts from carrying out solvent liquid or vapor.

[OAC rule 3745-21-09(O)(4)(b)]

c. The maximum annual cleaning solvent usage for this emissions unit shall not exceed 3,600 gallons based upon a rolling, 12 month summation of the cleaning solvent usage figures. To ensure enforceability during the first 12 calendar

months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the cleanup solvent usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Cleanup Solvent Usage
1	360
1-2	720
1-3	1,080
1-4	1,440
1-5	1,800
1-6	2,160
1-7	2,520
1-8	2,880
1-9	3,240
1-10	3,600
1-11	3,600
1-12	3,600

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual cleaning solvent usage limitation shall be based upon a rolling, 12 month summation of the cleaning solvent usage figures.

[OAC rule 3745-31-05(D)]

d. The annual VOC emissions from this emissions unit shall not exceed 12.1 tons per rolling 12 month period.

[OAC rule 3745-31-05(D)]

c) Operational Restrictions

(1) The conveyorized degreaser shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

a. Workplace fans shall not be placed near the degreaser opening, and exhaust ventilation shall not exceed 65 cubic feet per minute per square foot of degreaser opening, unless a higher rate is necessary to meet Occupational Safety and Health Administration requirements.

b. Openings to the conveyorized degreaser shall be minimized during operation, so that entrances and exits silhouette workloads, with an average clearance between the parts and the edge of the degreaser opening of less than 10 percent of the width of the opening.

c. The conveyorized degreaser shall be provided with downtime covers for closing off the entrance and exit during shutdown hours.

d. Emissions from carry-out shall be minimized by:

i. racking parts so that solvent drains freely from parts and is not trapped; and

ii. maintaining the vertical conveyor speed at less than 11 feet per minute.

e. Waste solvent shall be stored in covered containers.

f. Solvent leaks shall be repaired immediately, or the degreaser shall be shut down.

g. The conveyorized degreaser shall be operated such that water cannot be visually detected in solvent exiting the water separator.

h. Downtime covers shall be placed over entrances and exits of the conveyorized degreaser at all times when the conveyors and exhausts are not being operated.

i. Porous and/or absorbent materials shall not be cleaned in the conveyorized degreaser.

[OAC rule 3745-21-09(O)(4)(e)]

(2) The volatile organic compound (VOC) content of the cleaning solvent employed in this emissions unit shall not exceed 6.7 pounds per gallon.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. the name and ID number of each cleanup solvent employed;

b. the VOC content of the cleanup solvent employed, in pounds per gallon;

c. the total cleaning solvent added to the conveyorized degreaser or the amount purchased for use in the emissions unit;

d. the total amount of solvent collected for disposal and/or recovery and shipped off-site;

e. the VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons per month; and

f. the rolling 12 month VOC emissions from this emissions unit, calculated using the summation of “e” plus the previous 11 months, in tons per rolling 12 month period.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01 and 3745-77-07(C)(1)]

(2) During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit the permittee shall maintain monthly records of the following information:

a. the cumulative clean solvent usage, in gallons

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record as established in section d)(1) of this permit.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01, OAC rule 3745-31-05(D), and 3745-77-07(C)(1)]

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 3,600 gallon limitation on cleanup solvent usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup solvent usage levels as specified in section b)(2)c., of this permit**;** and

b. all months when the VOC content of the cleanup solvent employed exceed 6.7 pounds per gallon.

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 3745-31-05(A)(3) as effective 11/30/01, OAC rule 3745-31-05(D), and 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.7 pounds VOC per hour

The above limitation is based on the following equation:

HER= Mux Mvoc

Where:

HER = Hourly emission rate, in pounds;

Mu = Maximum usage rate, in gallons, (1.0, from PTI application); and

Mvoc = Maximum VOC content, in pounds per gallon, (6.7, from PTI application).

Applicable Compliance Method:

Compliance is assumed based on the maximum usage rate being 1.0 gallons per hour and maximum VOC content of cleanup solvent being 6.7 pounds per gallon. Prior to making a "modification" as defined by OAC rule 3745-31-01 that would cause an increase in the hourly potential emissions from this emissions unit, the permittee will need to apply for and obtain all required air pollution permits.

b. Emission Limitation:

VOC emissions shall not exceed 12.1 tons per rolling 12 month period.

The above limitation is based on the following equation:

AER= (Aux Mvoc)/2000

Where:

AER = Annual emission rate, in tons;

Au = Annual usage rate, in gallons per rolling 12 month period, (3,600, from PTI application); and

Mvoc = Maximum VOC content, in pounds per gallon, (6.7, from PTI application).

Applicable Compliance Method:

Compliance shall be based on compliance with the usage and VOC content limitations and the record keeping requirements established as established in section in d), of this permit.

(2) Determination of the VOC emissions from the solvent metal cleaning shall use the following method:

a. the degreaser tank shall be cleaned before testing begins

b. records shall be maintained of the weight or volume of solvent used to initially fill the cleaning tank and the volume or weight of the make-up solvent added to the tank during the test period;

c. at the end of the test period (which can coincide with the normal solvent replacement cycle) the used solvent shall be pumped or drained out of the tank and the volume or weight measured using the same method applied in b above;

d. a record shall be maintained of the time (hours) passing between filling the tank with fresh solvent (start of test period) to the removal of the waste solvent;

e. a sample of the used solvent shall be analyzed for the percent oil, metal chips, and other contaminants (the oil and solvent proportions can be estimated by weighing samples of used solvent before and after boiling off the solvent);

f. from the analysis of the used/waste solvent in “e”, the volume or weight of oils, dissolved from the cleaned parts or work load, shall be documented;

g. the VOC emissions may be calculated as the difference between the total volume of solvent added to the cleaning tank during the test period (the amount used to initially fill the tank and the makeup solvent added) and (minus) the solvent contained in the used solvent pumped or drained out; and this difference in volume or weight multiplied by the solvent density (pounds per gallon) or VOC concentration (weight percent) of the degreasing solvent;

h. the average VOC emissions rate shall be calculated by dividing the total emissions calculated in “g”, by the total hours of the test period (and/or divided by the total parts cleaned during the test period if an emissions per production rate is required) as recorded in “d”; and

i. if waste solvents pumped from the solvent cleaning tank are not immediately sealed to prevent evaporation and if a record is not maintained of the volume or amount sent offsite for recovery and/or disposal, such waste solvent losses shall be included with those calculated above in any required emissions report(s) if it cannot be demonstrated that this volume of material has been properly recovered or disposed of and/or has not been lost through evaporation to the atmosphere.

* If solvent measurements are recorded by volume the density of the solvent shall be used to convert gallons to pounds.

[OAC rule 3745-21-10(D)]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Carburizing Furnaces 1 -3 2012: P135,P136,P137,

EU ID	Operations, Property and/or Equipment Description
P135	P135 Carburizing Furnace #1, Pre-Heater, Furnace, Endo Generator, Quench & Misc.
P136	P136 Carburizing Furnace #2, Pre-Heater, Furnace, Endo Generator, Quench & Misc.
P137	P137 Carburizing Furnace #3, Pre-Heater, Furnace, Endo Generator, Quench & Misc.

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) OAC rule 3745-31-05(A)(3), as effective 11/30/01	The hourly emissions from this emissions unit shall not exceed the following: 0.04 pound of particulate matter (PM); 0.94 pound of nitrogen oxides (NOx); 2.44 pound of carbon monoxide (CO); 0.054 pound of organic compounds (OC); 0.04 pounds of volatile organic compounds (VOC); and 0.032 pound of sulfur oxides (SOx). Visible PE shall not exceed 5% opacity, as a 6-minute average. The requirements of this rule include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B), 3745-18-06(E)(2) and 3745-31-05(D).
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)b., below.
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid PSD	See section b)(2)d., below.
d.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-18-06(E)(2)	The SO2 emissions limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	ORC 3704.03 (T) (BAT for emissions greater than or equal to 10 TPY)	The hourly carbon dioxide (CO2) emissions from this emissions unit shall not exceed 726.7 pounds.

(2) Additional Terms and Conditions

a. 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.

b. 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), nitrogen oxide (NOx), carbon monoxide (CO), organic compound (OC), volatile organic compound (VOC), and sulfur dioxide (SOx) emissions from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

c. The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with the hourly emission limitation.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01]

d. The rolling 12 month emissions from this emissions unit shall not exceed the following:

i. 0.14 tons of particulate matter (PM);

ii. 3.4 tons of nitrogen oxides (NOx);

iii. 8.78 tons of carbon monoxide (CO);

iv. 0.19 tons of organic compounds (OC);

v. 0.14 tons of volatile organic compounds (VOC);

vi. 0.12 tons of sulfur oxides (SOx); and

vii. 2,616 tons of carbon dioxide (CO2).

[OAC rule 3745-31-05(D)]

c) Operational Restrictions

(1) The maximum operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hour levels specified in the following table:

Month(s)	Maximum Allowable Operating Hours
1	720
1-2	1,440
1-3	2,160
1-4	2,880
1-5	3,600
1-6	4,320
1-7	5,040
1-8	5,760
1-9	6,480
1-10	7,200
1-11	7,200
1-12	7,200

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual hour of operation limitation shall be based upon a rolling, 12 month summation of the operating hours.

[OAC rule 3745-31-05(D)]

(2) Fuel usage in this emission unit shall be only natural gas and/or liquid propane.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. the total hours of operation;

b. the rolling 12 month total hours of operation, calculated using the summation of "a" plus the previous 11 months, in tons per rolling 12 month period.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01 and 3745-77-07(C)(1)]

(2) During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit the permittee shall maintain monthly records of the following information:

a. the cumulative operational hours.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record as established in section d)(1) of this permit.

[OAC rule 3745-31-05(A)(3) as effective 11/30/01, OAC rule 3745-31-05(D), and 3745-77-07(C)(1)]

(3) The permittee shall maintain daily records during which fuel other than natural gas and/or liquid propane was employed in this emissions unit. The records shall list the type and quantity of fuel employed.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 7,200 hours of operation limit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation as specified in section c)(1), of this permit.

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 3745-31-05(A)(3) as effective 11/30/01, OAC rule 3745-31-05(D), and 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or liquid propane was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

0.94 pound of nitrogen oxides (NOx) per hour; and

2.44 pound of carbon monoxide (CO) per hour.

The above limitation is based on the following equation:

HER= Tr x Pf x Vf

Where:

HER = Hourly Emission Rate, in pounds per hour;

Tr = Honda Transmission of America Sept. 23, 2008 test results:

i. 0.25 pounds of NOx per hour; and

ii. 0.65 pounds of carbon monoxide per hour.

Pf = Production factor, based on size difference between tested sources and new sources:

Pf = AEPf / HTMf

Where:

AEPf = Capacity of new furnaces, 1,719 pounds of metal per hour;

HTMf = Capacity of tested furnaces, 573 pounds of metal per hour.

Pf = 1,719 / 573

Therefore Pf = 3.0

Vf = Process variability/safety factor, 125%.

Applicable Compliance Method:

Compliance is assumed based on the maximum hourly capacity of this emissions unit. Prior to making a "modification" as defined by OAC rule 3745-31-01 that would cause an increase in the hourly potential emissions from this emissions unit, the permittee will need to apply for and obtain all required air pollution permits.

b. Emission Limitation:

0.04 pound of particulate matter (PM) per hour;

0.054 pound of organic compound (OC) per hour;

0.04 pounds of volatile organic compound (VOC) per hour;

0.032 pounds of sulfur oxides (SOx) per hour; and

727 pounds of carbon dioxide (CO2) per hour.

The above limitation is based on the following equation:

HER= [(BTUhr burner x 1/1020 btu/scf x NGef) + (LPu x LPef)]

Where:

HER = Hourly Emission Rate, in pounds per hour;

BTUhr = Burner capacity, in BTU's per hour, (4 x 10^6 from PTI application);

NGef = Natural gas emissions factors:

7.6 pounds of PM per 10^6scf (AP-42 Table 1.4-2);

8.7 pounds of OC per 10^6scf (AP-42 Table 1.4-2);

5.5 pounds of VOC per 10^6scf (AP-42 Table 1.4-2);

0.6 pounds of SOx per 10^6scf (AP-42 Table 1.4-2); and

120.17 pounds of CO2 per 10^6scf (40 CFR Part 98 Subpart C, Tables C-1 and C-2)

LPu = Liquid Propane usage rate, in gallons per hour (20, from PTI application);

LPef = Liquid Propane emissions factors:

0.7 pounds of PM per 1,000 gallons (AP-42 Table 1.5-1, 07/08);

0.8 pounds of OC per 1,000 gallons (AP-42 Table 1.5-1, 07/08);

0.8 pounds of VOC per 1,000 gallons (AP-42 Table 1.5-1, 07/08);

1.5 pounds of SOx per 1,000 gallons (AP-42 Table 1.5-1, 07/08); and

12.77 pounds of CO2 per gallon (40 CFR Part 98 Subpart C, Tables C-1 and C-2)

Applicable Compliance Method:

Compliance is assumed based on the maximum hourly capacity of the natural gas and liquid propane burners associated this emissions unit. Prior to making a "modification" as defined by OAC rule 3745-31-01 that would cause an increase in the hourly potential emissions from this emissions unit, the permittee will need to apply for and obtain all required air pollution permits.

c. Emission Limitation:

0.14 tons of particulate matter (PM);

3.4 tons of nitrogen oxides (NOx);

8.78 tons of carbon monoxide (CO);

0.19 tons of organic compounds (OC);

0.14 tons of volatile organic compounds (VOC);

0.12 tons of sulfur oxides (SOx); and

2,616 tons of carbon dioxide (CO2).

The above limitation is based on the following equation:

AER= (HER x 7,200 hours)/2000

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established as established in section in d), of this permit.

d. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average, from any baghouse or any roof vent serving this emissions unit.

Applicable Compliance method

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

(2) When requested, emissions testing shall be conducted on this emissions unit. The emission testing shall be performed in accordance with the following requirements:

a. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations.

b. The following test methods shall be employed for both heat treat and the endothermic gas generators to demonstrate compliance:

i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);

ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);

v. Method 7, as appropriate, of 40 CFR Part 60, Appendix A (for NOx emissions); and

vi. Method 10, as appropriate, of 40 CFR Part 60, Appendix A (for CO emissions).

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

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

(3) Not later than 30 days prior to the proposed test date, 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.

(4) A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to 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 Ohio EPA, Southwest District Office.

g) Miscellaneous Requirements

(1) None.