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

6/5/2012

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
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0575000174
Permit Number: P0109844
Permit Type: Initial Installation
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 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 Josh Mandel," 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 by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

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

Response to Comments

Facility ID:	0575000174
Facility Name:	Honda of America Mfg., Inc. Anna Engine Plant
Facility Description:	Automobile manufacturing.
Facility Address:	12500 Meranda Road Anna, OH 45302-9699 Shelby County
Permit:	P0109844, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sidney Daily News on 05/02/2012. The comment period ended on 06/01/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Baghouse number

a. Comment: Minor reference change – Honda has mistakenly listed Baghouse #1 instead of listing Baghouse #10 as a control device. (In several pages, both Baghouse #1 and Baghouse #10 are listed) Please update these pages to only read “Baghouse #10

b. Response: Changes made.

2. Topic: Consistent with existing permits and VE testing

a. Comment: Please modify the applicable compliance method to read “If Required” compliance shall be determined through visible emission observations….. This language would be consistent with other PTI’s and Honda’s new Title V Permit

b. Response: Changes made.

3. Topic: Elimination of additional and unnecessary laguage

a. Comment: It appears that there is some language from a previous draft that needs to be deleted. Beginning the 5th paragraph on page 26 (3.35 tons….) through the 5th paragraph on page 27 (AEP = 3.35….) Please delete this unnecessary language.

b. Response: Changes made.

Ohio | Environmental Protection Agency

FINAL

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

Facility ID:	0575000174
Permit Number:	P0109844
Permit Type:	Initial Installation
Issued:	6/5/2012
Effective:	6/5/2012

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): A0043944
Permit Number: P0109844
Permit Description: Honda is requested a permit to install for 1-Electric Induction Iron Melting Furnace, 1-Permanent Mold Casting Machine, 1-Gate Cutting System and 1-Finishing Deburring System. These processes are for the production of Automotive Iron Castings.
Permit Type: Initial Installation
Permit Fee: $3,000.00
Issue Date: 6/5/2012
Effective Date: 6/5/2012

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: P0109844
Permit Description: Honda is requested a permit to install for 1-Electric Induction Iron Melting Furnace, 1-Permanent Mold Casting Machine, 1-Gate Cutting System and 1-Finishing Deburring System. These processes are for the production of Automotive Iron Castings.

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

Emissions Unit ID:	**P925**
Company Equipment ID:	FC Line #3 QCC#3 Melting (P925)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P926**
Company Equipment ID:	FC Line #3 QCC#3 Casting (P926)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P927**
Company Equipment ID:	FC Line #3 QCC#3 Gate Cut (P927)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P928**
Company Equipment ID:	FC Line #3 QCC#3 Finishing Deburr (P928)
Superseded Permit Number:	
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 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. P925, FC Line #3 QCC#3 Melting (P925)

Operations, Property and/or Equipment Description:

Ferrous Casting Line #3 QCC-3 Melting w/ baghouse

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 paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of a building enclosure and baghouse control system with a maximum emission rate of 0.005 grains of particulate emissions (PE) per dry standard cubic feet (dscf). The requirements of this rule also include compliance with the requirements and OAC rule 3745-31-5(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)	The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926. P927, and P928, shall not exceed 7.41 tons (PE) per year. The fugitive emissions from P925 shall not exceed 0.60 tons of PE per year.
d.	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 (D).

e.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emissions unit is controlled by shall not exceed 20% opacity, as a 6-minute average.
f.	OAC rule 3745-17-08(B)	Exempt. See Section b)(2)a., below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

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) from since the “controlled” potential to emit is less than ten tons per year

c. 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.

d. This Permit to Install (PTI) for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum allowable emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf). Along with the operational limitations under section c) of this permit, this permit constitutes a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

e. 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.

f. 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.

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.

(2) The maximum annual production rate for this emissions unit shall not exceed 12,800 tons of metal processed, based upon a rolling, 12 month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. the production rate for each month, in tons of metal processed;

b. the rolling, 12-month summation of the production rates, in tons of metal processed;

c. the rolling, 12-month summation of the operating hours; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

(2) 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.

(3) 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.

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 12,800 tons of metal processed limitation;

b. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and

c. 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)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

(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.

f) Testing Requirements

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

a. Emission Limitation:

The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926, P927, and P928 is 7.41 tons (PE)combined per year.

The PE annual emission from baghouse #10 is based on the following equation:

AER = [(Af x Ef x 60 mins/hr x Cf) x Ho] / 2000

Where:
AER = Particulate emissions, in tons per rolling 12 month period;
Af = Maximum Air Flow from Baghouse # 10, in acfm, (48,000, 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, maximum potential hours per year).

Applicable Compliance Method:

Compliance shall be assumed based on verification of the 0.005 grains/dscf by periodic stack testing in section f)(2), the maximum annual hours of operation at 7,200, and the recordkeeping in section d) of this permit.

b. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P925 is 0.6 tons (PE) per year.

The potential fugitive PE per year is based on the following equation:

FER = [((MAMR x (Fce + Me + Tpe + Tfe + Tte)] x (1 - Cp%)]} /2000

Where:

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

MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month); from the data provide by Honda);

Fce = PE emission factor Charging (0.6 lb of PE/ton of metal, from SCC 3-04-003-15, Fire);

Me = Melting Emission Factor (0.9 lbs/ton, from SCC 3-04-003-3, Fire);

Tfe = Transfer System Emission Factor (0.36 lbs/ton, from SCC 3-04-003-15, Fire);

Cp% = Capture Efficiency of hooding and venting system (95% from Honda's EAC Form); and

Applicable Compliance Method:

Compliance with the above PE limitation is assumed based on continuous compliance with the above listed operational restrictions and the recordkeeping in sections d) of this permit.

c. Emission Limitation:

0.005 grains/ dscf,

Applicable Compliance Method:

Compliance with the above limitations will be verified by periodic stack testing of the baghouses being employed at this facility to minimize and/or eliminate the particulate emissions (PE) from this emissions unit, as required by section f)(2) of this permit.

The permittee shall demonstrate compliance with the PE limitations based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. If isolation of the emissions from this emissions unit cannot be achieved because of operational restrictions, compliance will be assumed as long as compliance with the PE concentration limit from each baghouse serving this unit is maintained,(0.005 gr/dscf).

d. Emission Limitation

Visible particulate emissions from the baghouse(s) stack(s) shall not exceed 20% percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(2) The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

a. The emission testing shall be conducted within 1 year of the initiation of operations of this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations and to verify Honda's estimate emission rates being emitted from the baghouse(s) that are controlling or may be used to control this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

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.

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.

g) Miscellaneous Requirements

(1) None.

2. P926, FC Line #3 QCC#3 Casting (P926)

Operations, Property and/or Equipment Description:

Ferrous Casting Line #3 QCC-3 Casting w/ baghouse

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 paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of a building enclosure and baghouse control system with a maximum emission rate of 0.005 grains of particulate emissions (PE) per dry standard cubic feet (dscf). The requirements of this rule also include compliance with the requirements and OAC rule 3745-31-5(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)	The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926. P927, and P928, shall not exceed 7.41 tons (PE) per year. The fugitive emissions from P926 shall not exceed 2.18 tons of PE per year
d.	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 (D).

e.	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.
f.	OAC rule 3745-17-08(B)	Exempt. See Section b)(2)a., below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

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) from this emissions unit since the federally enforceable potential emissions is less than ten tons per year.

c. 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.

d. This Permit to Install (PTI) for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum allowable emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf). Along with the operational limitations under section c) of this permit, this permit constitutes a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

e. 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.

f. 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.

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.

(2) The maximum annual production rate for this emissions unit shall not exceed 12,800 tons of metal processed, based upon a rolling, 12 month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. the production rate for each month, in tons of metal processed;

b. the rolling, 12-month summation of the production rates, in tons of metal processed;

c. the rolling, 12-month summation of the operating hours; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

(2) 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.

(3) 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.

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 12,800 tons of metal processed limitation;

b. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and

c. 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)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

(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.

f) Testing Requirements

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

a. Emission Limitation

The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926, P927, and P928 is 7.41 tons (PE)combined per year.

The potential PE annual emission from baghouse #10 is based on the following equation:

AER = [(Af x Ef x 60 mins/hr x Cf) x Ho] / 2000

Where:
AER = Particulate emissions, in tons per rolling 12 month period;
Af = Maximum Air Flow from Baghouse # 10, in acfm, (48,000, 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, maximum potential hours per year).

Applicable Compliance Method:

Compliance shall be assumed based on verification of the 0.005 grains/dscf by periodic stack testing in section f)(2), the maximum annual hours of operation at 7,200, and the recordkeeping in section d) of this permit.

b. Emission Limitation

The fugitive particulate emissions (PE) from emissions unit P926 is 2.18 tons (PE) per year.

The potential fugitive PE per year is based on the following equation:

FER = [((MAMR x (Fdi + Fpo)] x (1 - Cp%)]} /2000

Where:

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

MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month); from the data provide by Honda);

Fdi = PE emission factor Ductile Inoculation (4.0 lb of PE/ton of metal, from SCC 3-04-003-10, Fire);

Fpo = PE emission factor Pouring (2.8 lb of PE/ton of metal, from SCC 3-04-007-08, Fire);

Cp% = Capture Efficiency of hooding and venting system (95% from Honda's EAC Form); and

Applicable Compliance Method:

Compliance with the above PE limitation is assumed based on continuous compliance with the above listed operational restrictions and the recordkeeping in sections d) of this permit

c. Emission Limitation:

0.005 grains/ dscf,

Applicable Compliance Method:

Compliance with the above limitations will be verified by periodic stack testing of the baghouses being employed at this facility to minimize and/or eliminate the particulate emissions (PE) from this emissions unit, as required by section f)(2) of this permit.

The permittee shall demonstrate compliance with the PE limitations based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. If isolation of the emissions from this emissions unit cannot be achieved because of operational restrictions, compliance will be assumed as long as compliance with the PE concentration limit from each baghouse serving this unit is maintained,(0.005 gr/dscf).

d. Emission Limitation

Visible particulate emissions from the baghouse(s) stack(s) shall not exceed 20% percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(2) The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

a. The emission testing shall be conducted within 1 year of the initiation of operations of this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations and to verify Honda's estimate emission rates being emitted from the baghouse(s) that are controlling or may be used to control this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

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.

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.

g) Miscellaneous Requirements

(1) None.

3. P927, FC Line #3 QCC#3 Gate Cut (P927)

Operations, Property and/or Equipment Description:

Ferrous Casting Line #3 QCC-3 Gate Cut w/ baghouse

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 paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of a building enclosure and baghouse control system with a maximum emission rate of 0.005 grains of particulate emissions (PE) per dry standard cubic feet (dscf). The requirements of this rule also include compliance with the requirements and OAC rule 3745-31-5(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)	The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926. P927, and P928, shall not exceed 7.41 tons (PE) per year. The fugitive emissions from P927 shall not exceed 0.11 tons of PE per year
d.	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 (D).

e.	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.
f.	OAC rule 3745-17-08(B)	Exempt. See Section b)(2)a., below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

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) from since the “controlled” potential to emit is less than ten tons per year.

c. 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.

d. This Permit to Install (PTI) 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 avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) and constituting a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

e. This Permit to Install (PTI) for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum allowable emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf). Along with the operational limitations under section c)

of this permit, this permitconstitutes a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

f. 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.

g. 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.

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.

(2) The maximum annual production rate for this emissions unit shall not exceed 12,800 tons of metal processed, based upon a rolling, 12 month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. the production rate for each month, in tons of metal processed;

b. the rolling, 12-month summation of the production rates, in tons of metal processed;

c. the rolling, 12-month summation of the operating hours; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

(2) 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.

(3) 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.

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 12,800 tons of metal processed limitation;

b. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and

c. 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.

f) Testing Requirements

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

a. Emission Limitation

The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926, P927, and P928 is 7.41 tons (PE)combined per year.

The PE annual emission from baghouse #10 is based on the following equation:

AER = [(Af x Ef x 60 mins/hr x Cf) x Ho] / 2000

Where:
AER = Particulate emissions, in tons per rolling 12 month period;
Af = Maximum Air Flow from Baghouse # 10, in acfm, (48,000, 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, maximum potential hours per year).

Applicable Compliance Method:

Compliance shall be assumed based on verification of the 0.005 grains/dscf by periodic stack testing in section f)(2), the maximum annual hours of operation at 7,200, and the recordkeeping in section d) of this permit.

b. Emission Limitation:

The potential fugitive particulate emissions (PE) from emissions unit P927 is 0.11 tons (PE) per year.

The potential fugitive PE per year is based on the following equation:

FER = [((MAMR x (Fgc)] x (1 - Cp%)]} /2000

Where:

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

MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month); from the data provide by Honda);

Fgt = PE emission factor Gate Cutting (1.7 lb of PE/ton of metal, from SCC 3-04-003-40, Fire);

Cp% = Capture Efficiency of hooding and venting system (99% from Honda's EAC Form); and

Applicable Compliance Method:

Compliance with the above PE limitation is assumed based on continuous compliance with the above listed operational restrictions and the recordkeeping in sections d) of this permit

c. Emission Limitation:

0.005 grains/ dscf,

Applicable Compliance Method:

Compliance with the above limitations will be verified by periodic stack testing of the baghouses being employed at this facility to minimize and/or eliminate the particulate emissions (PE) from this emissions unit, as required by section f)(2) of this permit.

The permittee shall demonstrate compliance with the PE limitations based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. If isolation of the emissions from this emissions unit cannot be achieved because of operational restrictions, compliance will be assumed as long as compliance with the PE concentration limit from each baghouse serving this unit is maintained,(0.005 gr/dscf).

d. Emission Limitation

Visible particulate emissions from the baghouse(s) stack(s) shall not exceed 20% percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(2) The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

a. The emission testing shall be conducted within 1 year of the initiation of operations of this emissions unit.

b. .The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations and to verify Honda's estimate emission rates being emitted from the baghouse(s) that are controlling or may be used to control this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

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.

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.

g) Miscellaneous Requirements

(1) None.

4. P928, FC Line #3 QCC#3 Finishing Deburr (P928)

Operations, Property and/or Equipment Description:

Ferrous Casting Line #3 QCC-3 Finishing Deburr w/ baghouse

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 paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of a building enclosure and baghouse control system with a maximum emission rate of 0.005 grains of particulate emissions (PE) per dry standard cubic feet (dscf). The requirements of this rule also include compliance with the requirements and OAC rule 3745-31-5(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)	The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926. P927, and P928, shall not exceed 7.41 tons (PE) per year. The fugitive emissions from P928 shall not exceed 0.01 tons of PE per year
d.	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 (D).

e.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emissions unit is controlled by shall not exceed 20% opacity, as a 6-minute average.
f.	OAC rule 3745-17-08(B)	Exempt. See Section b)(2)a., below.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

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) from since the “controlled” potential to emit is less than ten tons per year

c. 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.

d. This Permit to Install (PTI) for this emissions unit takes into account the use of a baghouse system, when this emissions unit is in operation, with a maximum allowable emission rate of 0.005 grains of particulate (PE) emissions per dry standard cubic feet (dscf). Along with the operational limitations under section c) of this permit, this permit constitutes a Synthetic Minor under the applicable emission threshold of Prevention of Significant Deterioration (PSD) requirements.

e. 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.

f. 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.

c) Operational Restrictions

(1) The maximum annual operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.

(2) The maximum annual production rate for this emissions unit shall not exceed 38,400 tons of metal processed, based upon a rolling, 12 month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. the production rate for each month, in tons of metal processed;

b. the rolling, 12-month summation of the production rates, in tons of metal processed;

c. the rolling, 12-month summation of the operating hours; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

(2) 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.

(3) 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.

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 38,400 tons of metal processed limitation;

b. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and

c. 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)] and [OAC rule 3745-15-03(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.

f) Testing Requirements

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

a. Emission Limitation

The particulate emissions (PE) from baghouse # 10, which controls emissions from emissions units, P925, P926, P927, and P928 is 7.41 tons (PE)combined per year.

The PE annual emission from baghouse #10 is based on the following equation:

AER = [(Af x Ef x 60 mins/hr x Cf) x Ho] / 2000

Where:
AER = Particulate emissions, in tons per rolling 12 month period;
Af = Maximum Air Flow from Baghouse # 10, in acfm, (48,000, 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, maximum potential hours per year).

Applicable Compliance Method:

Compliance shall be assumed based on verification of the 0.005 grains/dscf by periodic stack testing in section f)(2), the maximum annual hours of operation at 7,200, and the recordkeeping in section d) of this permit.

b. Emission Limitation

The fugitive particulate emissions (PE) from emissions unit P928 is 0.01 tons (PE) per year.

The fugitive PE per year is based on the following equation:

FER = [((MAMR x (Ffe)] x (1 - Cp%)]} /2000

Where:

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

MAMR = maximum annual metal (iron throughput) rate (38,400 tons/rolling 12-month); from the data provide by Honda);

Ffe = PE emission factor Casting Finishing (0.0045 lb of PE/ton of metal, from SCC 3-04-003-60, Fire);

Cp% = Capture Efficiency of hooding and venting system (99% from Honda's EAC Form); and

Applicable Compliance Method:

Compliance with the above PE limitation is assumed based on continuous compliance with the above listed operational restrictions and the recordkeeping in sections d) of this permit

c. Emission Limitation:

0.005 grains/ dscf,

Applicable Compliance Method:

Compliance with the above limitations will be verified by periodic stack testing of the baghouses being employed at this facility to minimize and/or eliminate the particulate emissions (PE) from this emissions unit, as required by section f)(2) of this permit.

The permittee shall demonstrate compliance with the PE limitations based upon the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A. If isolation of the emissions from this emissions unit cannot be achieved because of operational restrictions, compliance will be assumed as long as compliance with the PE concentration limit from each baghouse serving this unit is maintained, (0.005 gr/dscf).

d. Emission Limitation

Visible particulate emissions from the baghouse(s) stack(s) shall not exceed 20% percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(2) The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

a. The emission testing shall be conducted within 1 year of the initiation of operations of this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations and to verify Honda's estimate emission rates being emitted from the baghouse(s) that are controlling or may be used to control this emissions unit.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations and to verify Honda's estimated emission rate of 0.005 grain /dscf.

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.

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.

g) Miscellaneous Requirements

(1) None.