

Synthetic Minor Determination and/or  Netting Determination

Permit To Install ~~05-12592~~

**A. Source Description**

New Installation to add a shot blast operation to the Ferrous Casting Line #3. This emissions unit is controlled with a fabric filter which emits 0.001 gr PE/dscf.

**B. Facility Emissions and Attainment Status**

Honda of America Manufacturing, Incorporated is a minor stationary source and permitted as a Title V facility. The federally enforceable limits and 8,760 hour emission calculations for the currently permitted units produced the following emission summary for Honda of America's Anna facility:

1. 193.29 TPY of particulate;
2. 67.97 TPY of S0x;
3. 183.81 TPY of N0x;
4. 237.6 TPY of CO, and
5. 140.99 TPY of VOC & OC combined

Honda of America Manufacturing, Incorporated is located in Shelby County which is attainment for TSP, S0x, N0x, C0, and VOC.

**C. Source Emissions**

While the uncontrolled emissions from the increased operation of the air emission units would exceed 250 tons per year and thus subject Honda of America to PSD review, the controlled emission rate will keep Honda of America a minor stationary source. The total increased emissions from the air emission units will be:

0.94 TPY of particulate (PE);

These emission estimates were calculated using the maximum throughput of iron for Ferrous Casting Line #3 shot blast operation of 3,000 tons per rolling, 12-months; and the emission rate from the fabric filter of 0.001 gr PE/dscf, and 7,200 annual hours of operation.

This air emission unit is controlled in the following ways:

1. Hooding and venting to a fabric filter with an emission rate not greater than 0.001 gr/dscf.
2. Fabric filters with an emission rate of not greater than 0.001 gr PE/dscf.

**D. Conclusion**

As mentioned above, this permit to install will have emission limitations, an annual operating hours restriction, yearly and monthly iron throughput restrictions and control equipment requirements.

The facility will maintain records indicating the total iron throughput for each month; and the rolling, 12 month summation of iron throughput and the annual hours of operation. On a quarterly basis, Honda of America Manufacturing, Incorporated will be required to submit a report demonstrating compliance with this operational restriction.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
SHELBY COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 05-12592**

**DATE: 6/12/2003**

Honda of America Mfg Inc  
Paul Huwer  
12500 MERANDA RD  
ANNA, OH 45302-9699

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

SWDO

IN

**SHELBY COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-12592 FOR AN AIR CONTAMINANT SOURCE FOR  
HONDA OF AMERICA MFG INC**

On 6/12/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America Mfg Inc**, located at **12500 Meranda Rd, Anna**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-12592:

**Ferrous Casting (FC) line 3 shot blast and line 3 rust preventive spray booth.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Phil Hinrichs, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911  
[(937)285-6357]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 05-12592**

Application Number: 05-12592  
APS Premise Number: 0575000174  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Honda of America Mfg Inc  
Person to Contact: Paul Huwer  
Address: 12500 MERANDA RD  
ANNA, OH 45302-9699

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**12500 Meranda Rd  
Anna, Ohio**

Description of proposed emissions unit(s):  
**Ferrous Casting (FC) line 3 shot blast and line 3 rust preventive spray booth.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Honda of America Mfg Inc

Facility ID: 0575000174

PTI Application: 05-12592

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping 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:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

## 2. 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 appropriate Ohio EPA District Office or local air agency 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).

## 3. 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.

## 4. 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.

## 5. Severability Clause

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.

**Honda of America Mfg Inc**

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**6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

**7. 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 this Permit To Install.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally

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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.

- b. 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:
  - i. 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.
  - ii. 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.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.

## **10. Permit To Operate Application**

- a. If 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

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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).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **12. 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.

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

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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.

#### **5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

#### **6. 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.

#### **7. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

**Honda of America Mfg Inc**  
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facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE-stack	<b>0.93</b>
PE-fugitive	<b>0.01</b>

Honda of America Mfg Inc  
PTI Application: 05 12502  
Issued

Facility ID: 0575000174

Emissions Unit ID: P086

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

The particulate emissions from baghouse (BH-8) serving the Ferrous Casting Line #3 baghouse(emissions unit (P086) shall not exceed 0.001 grain per actual cubic foot of the total exhaust gases.

The permittee reserves the right to direct the particulate emissions from any other existing or new emissions units (once permitted and thereby considered existing) to baghouse (BH-8) with the understanding that emissions will not exceed 0.001 grain per actual cubic foot of the total exhaust gases, and total flow directed to fabric filter BH-8 will not exceed 28,750 acfm ( $\pm 5\%$  variability).

Uncontrolled limits for Ferrous Casting Line #3 shot blast operation are based on iron throughput of 1.5 tons per hour and 3000 tons per year.

This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to the Ohio EPA within thirty days after documenting the change(s). This information would include, but is not limited to, the following:

- a. description of which emissions units were redirected to which baghouse, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01.

### B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

## Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Hond  
PTI A

Emissions Unit ID: P086

Issued: To be entered upon final issuance

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

OAC rule 3745-17-07(B)(1)

P086 - Ferrous casting line 3  
shotblast with hooding and  
venting to a fabric filter

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-11(B)(1)

OAC rule 3745-17-07(A)(1)

**Hond:**

**PTI A**

Emissions Unit ID: P086

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control  
Measures

0.26 lb of particulate emissions (PE) /hr- (stack emissions)  
0.93 ton of PE per rolling 12 months -(stack emissions)

0.01 lb of particulate emissions (PE)/hr- (fugitive emissions)  
0.01 ton PE/yr- (fugitive emissions)

0.001 grain of PE/dscf

0% opacity, as a six minute average, from the stack

20 % opacity, as a three minute average, from the fugitive dust source

The PE emission limitation specified by this rule is less stringent than the PE emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3)

This emissions unit is exempt

from the visible particulate limitation specified in OAC rule 3745-17-07(B)(1), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not a fugitive dust emissions unit located within the geographical area specified in Appendix A of OAC rule 3745-17-08.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** Best Available Technology (BAT) has been determined to be the use of hooding and venting to a baghouse for controlling the emissions from this emissions unit.

**II. Operational Restrictions**

1. 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 except for the first 45 days following a change of a least 50% of the fabric bags, when the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.
2. The maximum annual operating hours for this emissions unit shall not exceed 7,200 hours per year, based upon a rolling, 12- month summation of the operating hours.
3. The maximum throughput for this emissions unit shall not exceed 1.50 tons of iron per hour and 3,000 tons of iron per rolling, 12- months.

In order to ensure federal enforceability, for the first 12 calendar months of operation, Honda of America shall not exceed the following iron throughput for the specific time period.

<u>Month</u>	<u>Total Allowable Tons of Iron Throughput</u>
1	250
1-2	500
1-3	750
1-4	1000
1-5	1250
1-6	1500
1-7	1750
1-8	2000
1-9	2250
1-10	2500
1-11	2750
1-12	3000

### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The operating hours for each month.
  - b. The rolling , 12-month summation of the operating hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual . The permittee shall record the pressure drop across the baghouse once each operating day.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The total iron throughput for each month.
  - b. The rolling, 12-month summation of the iron throughput.

(No hourly recordkeeping required. 1.50 tons of iron per hour represents the maximum designed capacity of the equipment.)

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in term A. II. 1.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the emission unit did not comply with the maximum throughput restrictions or the first year cumulative throughput restriction specified in term A. II. 3.

### **V. Testing Requirements**

Compliance with the emission limitation(s) specified in section A.I.1 shall be determined in accordance with the following method(s):

1. Emission Limitation:  
  
0.001 grains of PE/dscf

The permittee shall conduct, or have conducted, emission testing for the baghouse in accordance with the following requirements:

**Honda  
PTI A**

Emissions Unit ID: P086

**Issued: To be entered upon final issuance**

- a. The emission testing shall be conducted within 6 months of project completion and mass production start-up.
- b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s).

Pollutant	Test Method	Location
PE	Methods 1-4 & 5	40 CFR Part 60, Appendix A

**\*\*Note:** Alternative US EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit(s) 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southwest District Office 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(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) 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 the completion of the test(s).

2. Emission Limitation:  
0.26 lb of PE/hour from the baghouse stack

Compliance shall be assumed as long as both the 0.001 gr. of PE/dscf limit from the baghouse stack and 0% opacity, as a six minute average, from the baghouse stack is met. This is based both on the operating requirements in term A.II. and the following calculation:

$$(BFR) \times (AV) \times (BEF) \times (TI) \times (CONV) = 0.26 \text{ lbs PE/hr}$$

where

BFR = Baghouse Flow Rate (28,750 acfm)

AV = the air variability factor (105%)

BEF = Baghouse Efficiency (0.001 grains/dscf)

TI = Time (60 minutes per hour)

CONV = conversion factor (1 lb = 7000 grains)

3. Emission Limitation:  
 0.93 ton of PE/yr - from the baghouse stack

Compliance shall be assumed as long the both the 0.001 gr. of PE/dscf limit from the baghouse stack and 0% Opacity, as a six minute average, from the baghouse stack is met. This is based both on the operating requirements in term A.II. and the following calculation:

$$(BFR) \times (AV) \times (BEF) \times (TI) \times (CONV1) \times (MAH) \times (CONV2) = 0.93 \text{ ton of PE/yr}$$

where

BFR = Baghouse Flow Rate (28,750 acfm)

AV = the air variability factor (105%)

BEF = Baghouse Efficiency (0.001 grains/dscf)

TI = Time (60 minutes per hour)

CONV1 = conversion factor (1 lb/ 7000 grains)

CONV2 = conversion factor (1 ton/ 2000 lbs)

MAH = maximum annual hours ( 7,200 hrs/yr)

4. Emission Limitation:  
 0.01 ton of PE/yr- (fugitive emissions)

Applicable Compliance Method: 0.01 ton PE/yr- (fugitive emissions), as a rolling 12-month summation from ferrous casting shotblast operation:

Compliance shall be assumed as long as the maximum iron throughput rate per rolling 12-month summation is not exceeded. This is based on the recordkeeping requirements in term A.III. and the following calculation:

$$(MMR) \times (PMER) \times (CONV) \times (1-CAP) \times (1-BCAP) = 0.01 \text{ tons of PE per year}$$

where

MMR = the maximum metal rate (3,000 tons per year)\*\*

PMER=the PM Emission rate (15.5 lb PM/ton of metal)(Modern Casting, January 1972)

CONV = conversion factor (1 ton/2000 lbs.)

CAP = Control Device Capture Efficiency (99.9%)

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BCAP = Building Capture Efficiency (70%) (April 10, 1998 letter to Ironton Iron Inc. from Stephen Giles, Director of Portsmouth Local Air Agency)

\*\*As long as the 12-month maximum iron throughput limitation in term A.II. is not exceeded, compliance with this limitation is demonstrated.

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4. Emission Limitation:  
0.01 lb of particulate emissions (PE)/hr- (fugitive emissions)

## Applicable Compliance Method:

Compliance shall be assumed as long as the maximum iron throughput rate of 1.50 tons of iron per hour is not exceeded. This is based on both the record keeping requirements in term A.III. and the following calculation.

$(MMR) \times (PMER) \times (1-CAP) \times (1-BCAP) = 0.01 \text{ lb of particulate emissions (PE)/hr- (fugitive emissions)}$

where

MMR = the maximum metal rate (1.50 ton iron/hour)\*\*

PMER=the PM Emission rate (15.5 lb PM/ton of metal)(Modern Casting, January 1972)

CAP = Control Device Capture Efficiency (99.9%)

BCAP = Building Capture Efficiency (70%) (April 10,1998 letter to Ironton Iron Inc. from Stephen Giles, Director of Portsmouth Local Air Agency)

\*\*This limit represents the maximum capacity of the Shotblast Machine. Since this limit reflects the maximum throughput capacity of this source, no additional compliance determination is required.

4. Emission Limitation:  
0% opacity, as a six-minute average, from the baghouse stack.

## Applicable Compliance Method:

Compliance shall be determined according to test method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60.

5. Emission Limitation:  
20% Opacity, as a three minute average, from any building exhaust associated with this emissions unit.

## Applicable Compliance Method:

40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building.

**VI. Miscellaneous Requirements**

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**Honda of America Mfg Inc**  
**PTI Application: 05 12502**  
**Issued**

**Facility ID: 0575000174**

Emissions Unit ID: P086

None

**Honda  
PTI A**

Emissions Unit ID: P086

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P086 - Ferrous casting line 3 shotblast with fabric filter	OAC rule 3745-31-05	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None