

## Synthetic Minor Determination and/or Netting Determination

Permit To Install: "05-13641"

### A. Source Description

Honda Manufacturer of American, has an engine production plant at 12500 Meranda Rd., Anna, Shelby County, Ohio. At present, this facility is defined as a Minor Source under PSD regulations. This Permit to Install (PTI) is to cover increases in the amount of materials processed and increase the allowable hours of operation.

### B. Facility Emissions and Attainment Status

Shelby County is attainment for all criteria pollutants. The Honda Anna Engine Plant is defined as a non-major stationary source for all criteria pollutants thresholds under Prevention of Significant Deterioration (PSD) standards. Based on data provided by Honda the estimated overall emissions for all criteria pollutants from this facility shall be maintained below the PSD threshold of 250 tons of all criteria, each.

### C. Source Emissions

This PTI covers the following emissions units:

- a. (P901) - 24.3 ton/hr cupola w/ ventilation to the afterburner and baghouse;
- b. (P910) - Holding furnace, controlled by baghouses; and
- c. (P911) - Transfer ladles from holding furnaces to pouring lines controlled by baghouses.

### D. Conclusion

At present, Honda Anna is defined as a "Non-Major" under PSD. The maximum annual amount of material employed in this emissions unit shall not exceed 110,230 tons of metal processed, based upon a rolling, 12 month summation of the production rates. Based on the annual metal processed restriction, it does not appear that Honda will change to a "Major" source under PSD.



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:** 05-13641

**Fac ID:** 0575000174

**DATE:** 5/8/2008

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, 43216-1049.

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 **\$3500** 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.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

SWDO

IN

**SHELBY COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-13641 FOR AN AIR CONTAMINANT SOURCE  
FOR Honda of America Mfg Inc**

On 5/8/2008 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 05-13641:

**Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations.**

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.

Jeff Hines, 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 05-13641**

Application Number: 05-13641  
Facility ID: 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):  
**Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations.**

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

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Chris Korleski  
Director

Honda of America Mfg Inc

Facility ID: 0575000174

PTI Application: 05-13641

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

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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 B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.
  - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

**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.

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**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.

**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 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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

**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 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. 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 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.

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- 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 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 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

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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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### 13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

### 1. Compliance Requirements

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.

### 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 (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.)

### 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

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of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing 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 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 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)**

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.

**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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the 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., postmarked), 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	44.25
CO	4.41
NOx	9.70
SOx	19.84
OC	1.11

**Honda of America Mfg Inc**  
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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

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

**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 - (P901) - 24.3 ton/hr cupola w/ ventilation to the afterburner and baghouse (the terms of this permit supersede those in PTI 05-02421 issued on 06/08/88).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>This emissions unit shall be equipped with an afterburner and baghouse in order to minimize and/or eliminate the release of air contaminates.</p> <p>The Sulfur Dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 8.75 lbs/hr.</p> <p>See Sections A.I.2.a. thru A.I.2.e., and A.II.3.</p>

Emissions Unit ID: P901

<p>OAC rule 3745-31-05(C)          (Synthetic minor to avoid PSD)</p>	<p>The particulate (PE) emissions from the baghouse cupola (BH-C) directly controlling the Cupola Melting Furnace shall not exceed 15.11 tons (PE)/ rolling 12-month period.</p> <p>The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions units: P017, P910, P901, and P911, shall not exceed 11.25 tons (PE)/ rolling 12-month period.</p> <p>The fugitive emissions from P901 shall not exceed 0.76 tons of PE/ rolling 12-month period.</p> <p>The combined nitrogen oxides (NOx) emissions from this emissions units shall not exceed 9.7 tons/ rolling 12-month period, from the process thermal incinerator combustion and fugitives.</p> <p>The Carbon Monoxide (CO) emissions shall not exceed 4.11 tons/ rolling, 12-month period, including fugitives.</p> <p>19.84 tons of Sulfur Dioxide (SO2)/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>The Organic Compound (OC) emissions shall not exceed 1.11 tons/ 12-month period, based on a rolling, 12-month summation, including fugitives.</p> <p>The maximum annual operating hours for this emissions unit shall not exceed 7200, based upon a rolling, 12 month summation of the operating hours.</p> <p>The maximum annual amount of material employed in this emissions unit shall not exceed 110,230 tons of metal processed, based upon a rolling, 12 month summation of the production rates.</p>
<p>OAC rule 3745-21-07(G)</p>	<p>The OC limitations specified by this rule is less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
<p>OAC rule 3745-17-07(A)(1)</p>	<p>Visible PE emissions from any baghouse vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.</p> <p>Visible PE emissions from any roof vent that emits emissions into the ambient air from this emission unit shall not exceed 20% opacity, as a 6-minute average.</p>
<p>OAC rule 3745-17-11(B)(1)</p>	<p>The PE emissions shall not exceed 24.69 lbs per hour.</p>
<p>OAC rule 3745-31-05(A)(3)(b)</p>	<p>See section A.I.2.f.</p>

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**2. Additional Terms and Conditions**

- 2.a** The PE from the metal separation and cupola tapping shall be controlled by venting the emissions to a baghouse sufficient to minimize visible emissions consistent with good engineering design, and an emission rate of less than or equal to 0.005 grain of PE/dscf.
- 2.b** The PE from the cupola melting furnace shall be controlled by venting the emissions to a baghouse sufficient to minimize visible emissions consistent with good engineering design, and an emission rate of less than or equal to 0.015 grain of PE/dscf.
- 2.c** 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.
- 2.d** Nothing in this permit shall preclude the permittee from routing emissions from the metal separation and cupola tapping 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.
- 2.e** Carbon Monoxide (CO) and Organic Compound (OC) Emissions from this emissions unit shall be controlled by use of a thermal incinerator that will reduce CO & OC.
- 2.f** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and organic compound (OC)/ volatile organic compound (VOC) from this emissions unit since the controlled potential emissions are less than ten tons per year.

**II. 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 amount of metal employed in this emission unit shall not exceed 24.3 tons/hr nor 110,230 tons/ 12-month period.

Emissions Unit ID: P901

3. The emissions unit shall employ only natural gas employed in the thermal incinerator.
4. The quality of the coke burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 5 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 5, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse #5, in tons, (the summation of:  $\{[(\text{"d"} \times 72,948 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times \text{"a"}\} / 2,000 \text{ lbs/ton}$ );
  - f. the rolling, 12-month total PE from baghouse # 5 The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
2. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse cupola (BH-C) as operated;
  - d. the particulate emissions (PE) rate from baghouse cupola (BH-C), in grains per dry standard cubic feet (g/dscf), 0.015 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse cupola (BH-C), in tons, (the summation of:  $\{[(\text{"d"} \times 72,948 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times \text{"a"}\} / 2,000 \text{ lbs/ton}$ );

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$x 32,652 \text{ acfm} \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000) \times \text{"a"} / 2,000 \text{ lbs/ton}$ );

- f. the rolling, 12-month total PE from baghouse cupola (BH-C). The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
3. The permittee shall maintain monthly records of the following information:
    - a. the amount of metal employed in this emissions unit, in tons;
    - b. the rolling, 12-month total metal employed in this emissions unit. The rolling, 12-month summation of the total sand employed (the total amount of metal employed for the current month ("a") plus the total amount of metal employed for the 11 previous calendar months);
    - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{metal processed "a"} \times 13.8 \text{ lbs/ton of metal, Fire SCC 304000301}) \times (1 - \text{hooding capture efficiency (99.9\%), best engineering assumption})] / 2000 \text{ lbs/ton}\}$ ; and
    - d. the rolling, 12-month total fugitive PE from this emissions unit. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ("c") plus the total amount of fugitive PE for the 11 previous calendar months).
  4. 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.

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

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the pressure drop across the baghouse once each operating day.

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

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

6. For each shipment of coke received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coke received, the permittee's or coke supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu).
7. The permittee shall maintain monthly records of the following information:
  - a. the amount of metal employed in this emissions unit, in tons;
  - b. the rolling, 12-month total metal employed in this emissions unit. The rolling, 12-month summation of the total sand employed (the total amount of metal employed for the current month ("a") plus the total amount of metal employed for the 11 previous calendar months);
  - c. the monthly SO<sub>2</sub> emissions, in tons, (the summation of: {(metal processed "a" x permittee's or coke supplier's calculated emission rate, lbs/ton of metal)/ 2000 lbs/ton]; and
  - d. the rolling, 12-month total SO<sub>2</sub> emissions from this emissions unit. The rolling, 12-month summation of the total SO<sub>2</sub> emissions (the total amount of SO<sub>2</sub> emitted for the current month ("c") plus the total amount of SO<sub>2</sub> emitted for the 11 previous calendar months).

#### IV. Reporting Requirements

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1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all exceedances of particulate emissions (PE) from the baghouse cupola (BH-C) directly controlling the Cupola Melting Furnace limitation of 15.11 tons (PE)/rolling 12-month period.;
  - b. all exceedances of the combined particulate emissions (PE) from baghouse 5 (BH-5) that is employed to control the PE emissions from the molten metal separator and tapping portions of this emission unit limitation of 11.25 tons (PE)/rolling 12-month period.
  - c. all exceedances of the rolling 12-month period metal employed of 110,230 tons per rolling 12-month period in this emissions unit;
  - d. all exceedances of the rolling 12-month period fugitive PE limitation of 1.01 tons per rolling 12-month period from this emissions unit;
  - e. all exceedances of the rolling, 12-month period 7,200 operation hour limitation;
  - f. 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; and/or
  - g. all exceedances of the rolling 12-month period SO<sub>2</sub> emission limitation of 19.84 tons per rolling 12-month period from this emissions unit

These quarterly deviation reports are due by the dates specified in Part I - General Terms and Conditions A.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.

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3. The deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Sections A.I.1 and A.II shall be determined in accordance with the following methods:

- a. Emission Limitation:

24.69 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

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

where:

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

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000301, emission factor of , 13.8 lbs emitted/ton of metal processed multiplied by 24.3 tons of metal processed /hr maximum).

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

Applicable Compliance Method:

Compliance with the above limitations is based on the 24.3 tons of metal processed being the maximum potential process rate for this emissions unit.

- b. Emission Limitation:

The particulate emissions (PE) from baghouse cupola (BH-C), which controls emissions from this emissions unit shall not exceed 15.11 tons/ rolling 12-month period.

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

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

where:

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

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Af = Maximum Air Flow from Baghouse Cupola, in acfm, (32,652, specific acfm rates are from the data provide by Honda);

Ef = Emission factor of the control device, grains of PE per dscf, (0.015 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);

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

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

Applicable Compliance Method:

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

c. Emission Limitation:

The particulate emissions (PE) from baghouse # 5, which controls emissions from this emissions unit shall not exceed 11.25 tons/ rolling 12-month period.

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

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

where:

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

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

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

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

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

Applicable Compliance Method:

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

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## d. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P901, shall not exceed 0.76 tons (PE)/ rolling 12-month period.

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

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

where:

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

MSR = Maximum metal processed rate, in tons, (110,230 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of metal, (13.8 lbs/ton of metal, Fire SCC 304000301); and

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

Applicable Compliance Method:

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

## e. Emission Limitation:

4.11 tons of CO/ 12-month period, based on a rolling, 12-month summation, including fugitives.

Applicable Compliance Method:

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

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

where:

AER = Annual Emission Rate;

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COER = Carbon monoxide Emission Rate (0.06 lbs/ton processed, Honda's Emission Test 2000);  
 CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.99%, (0.9999)); and  
 PER = Emission factor, (145 lbs/ton, AP-42 Table 12.10-3);  
 MMR = Maximum tons processed per 12-months (110,230, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections III.3, which verifies the amount of metal processed, and the results of the stack tests as required in Section A.V.2., which will verify Honda's stack test results from 2000, of this permit.

f. Emission Limitation:

9.7 tons of NO<sub>x</sub>/ 12-month period, based on a rolling, 12-month summation, including fugitives.

Applicable Compliance Method:

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

$$\text{AER} = \{(\text{NOXER} \times \text{MMR}) + [(\text{PER} \times \text{MMR}) \times (1 - \text{CAP})] + (\text{Efg} \times \text{NGu})\} / 2000$$

where:

AER = Annual Emission Rate;  
 NOXER = stacked Nitrogen Oxides (NO<sub>x</sub>) Rate (0.17 lbs/ton processed, Honda's Emission Test 2000);  
 CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.9%, (0.999)); and  
 PER = Emission factor, (0.1 lbs/ton, AP-42 Table 12.10-3);  
 MMR = Maximum tons processed per 12-months (110,230, Honda's Emission Activity Form);  
 Efg = Natural gas combustion NO<sub>x</sub> emission factor, 100 lbs/mmscf; and  
 NGu = natural gas usage in thermal incinerator, 5.8 mmscf/yr (0.82 mmbtu/hr natural gas fired / 1020 btu/scf) x 7200 hrs/yr).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections III.3, which verifies the amount of metal processed, and the use of natural gas in the thermal oxidizer, of this

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permit.

g. Emission Limitation:

19.84 tons of SO<sub>2</sub>/ 12-month period, based on a rolling, 12-month summation.

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

$$\text{AER} = [(\text{PER} \times \text{S}\% ) \times \text{MMR}] / 2000$$

where:

AER = Annual Emission Rate;  
PER = Emission factor, (1.2 lbs/ton, AP-42, Table 12.10-5);  
S% = percent sulfur, (30%, AP-42, Table 12.10-5, reference "d"); and  
MMR = Maximum tons processed per 12-months (110,230, Honda's Emission Activity Form).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Section III.3, which verifies the amount of metal processed, and Sections A.III.6, and A.III.7, of this permit.

h. Emission Limitation:

8.75 lbs of SO<sub>2</sub>/ hour.

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

$$\text{HER} = [(\text{PER} \times \text{S}\% ) \times \text{MMR}]$$

where:

HER = Hourly Emission Rate;  
PER = Emission factor, (1.2 lbs/ton, AP-42, Table 12.10-5);  
S% = percent sulfur, (30%, AP-42, Table 12.10-5, reference "d"); and  
MMR = Maximum tons processed per hour (24.3, Honda's Emission Activity Form).

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Applicable Compliance Method:

The hourly sulfur dioxide (SO<sub>2</sub>) emissions of 8.75 pounds per hour was based on the maximum potential production rate of 24.3 tons per hour, emission factor from AP-42 Table 12.10-5, and an assumed sulfur content based on reference "d" of AP-42 Table 12.10-5. The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections A.III.6, of this permit.

i. Emission Limitation:

1.11 tons of OC/ 12-month period, based on a rolling, 12-month summation, including fugitives.

Applicable Compliance Method:

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

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

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where:

AER = Annual Emission Rate;

OCER = organic compound (OC) Emission Rate (0.02 lbs/ton processed, Honda's

Emission Test 2000);

CAP = Hooding Capture Efficiency, (based on Honda's best estimate on hooding capture of 99.9%, (0.999)); and

PER = Emission factor, (0.18 lbs/ton, AP-42 Table 12.10-3);

MMR = Maximum tons processed per 12-months (110,230, Honda's Emission Activity Form).

**Applicable Compliance Method**

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections III.3, which verifies the amount of metal processed, of this permit.

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

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

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 1 year the issuance date of this permit or within 1 year prior to this facilities' Title V expiration, which ever occurs first.
  - b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations:
    - i. mass emission rate(s) of CO to not exceed 0.06 lbs/ton of metal processed;
    - ii. allowable concentration of PE in the exhaust stream, grains/dscf; and
    - iii. allowable emission rate of SO<sub>2</sub>.
  - c. The following test method(s) shall be employed to demonstrate compliance with the above testing requirements:
    - i. CO: Methods 1-4, and 10 of 40 CFR Part 60;
    - ii. PE: Methods 1-5 of 40 CFR Part 60, Appendix A; and

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iii. SO<sub>2</sub>: Methods 6, Method 6A, Method 6B, or Method 6C.

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 emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. 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 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).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

**VI. Miscellaneous Requirements**

None

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**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.

**Operations, Property, and/or Equipment - (P901) - 24.3 ton/hr cupola w/ ventilation to the afterburner and baghouse (the terms of this permit supersede those in PTI 05-02421 issued on 06/08/88).**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	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

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****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 - (P910) - Holding furnace, controlled by baghouses.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid PSD)	<p>The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions units: P017, P910, P901, and P911, shall not exceed 11.25 tons (PE)/ rolling 12-month period.</p> <p>The particulate emissions (PE) from baghouse # 7, which controls emissions from emissions units: P908, P910, P901, P076, and P911, shall not exceed 13.83 tons (PE)/ rolling 12-month period.</p> <p>The fugitive emissions from P910 shall not exceed 2.48 tons of PE/ rolling 12-month period.</p> <p>See section I.2.a. thru 2.c.</p> <p>See Section II.2</p>
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.
OAC rule 3745-17-11(B)(1)	The PE emissions shall not exceed 4.24 lbs per hour.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 05-13641 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.

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- 2.b** This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
  
- 2.c** Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control device associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.

**II. 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. This The maximum annual production rate for this emissions unit shall not exceed 110,230 tons of metal processed, based upon a rolling,12 month summation of the production rates.

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

- 1. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  
  - c. the hours that baghouse # 5 was operated;
  
  - d. the particulate emissions (PE) rate from baghouse # 5, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  
  - e. the monthly PE from baghouse #5, in tons, (the summation of:  $\{[("d" \times 72,948 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a"\} / 2,000 \text{ lbs/ton}$ ));
  
  - f. the rolling, 12-month total PE from baghouse # 5. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).

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2. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 7 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 7, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse #7 in tons, (the summation of:  $\{[("d" \times 89,655 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a"\} / 2,000 \text{ lbs/ton}$ ));
  - f. the rolling, 12-month total PE from baghouse # 7. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
3. The permittee shall maintain monthly records of the following information:
  - a. the amount of metal employed in this emissions unit, in tons;
  - b. the rolling, 12-month total metal employed in this emissions unit. The rolling, 12-month summation of the total sand employed (the total amount of metal employed for the current month ("a") plus the total amount of metal employed for the 11 previous calendar months);
  - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{metal processed "a"} \times 0.9 \text{ lbs/ton of metal, Fire SCC 304000303}) \times (1 - \text{hooding capture efficiency (95.0\%, best engineering assumption)})] / 2000 \text{ lbs/ton}$ }; and
  - d. the rolling, 12-month total fugitive PE from this emissions unit. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ("c") plus the total amount of fugitive PE for the 11 previous calendar months).
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (ie., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operational log. If visible emissions are observed, the permittee shall also

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note the following in the operational log;

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

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

5. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation. The exception is for the first 45 days following a change of at least 50% of the fabric bags. During that time, the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

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

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.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all exceedances of combined particulate emissions (PE) from the baghouse #5 which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P911 Transfer Ladles limitation of 11.25 tons (PE)/ rolling 12-month period.

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- b. all exceedances of the combined particulate emissions (PE) from baghouse # 7 (BH-5) , which controls emissions from emissions unit P908, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P076 Sand Plant, P911 Transfer Ladles limitation of 13.83 tons (PE)/rolling 12-month period.
- c. all exceedances of the rolling 12-month period metal employed of 110,230 tons per rolling 12-month period in this emissions unit;
- d. all exceedances of the rolling 12-month period fugitive PE limitation of 2.48 tons per rolling 12-month period from this emissions unit;
- e. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and/or
- f. 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.

These quarterly deviation reports are due by the dates specified in Part I - General Terms and Conditions A.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 quarterly deviation reports are due by the dates specified in Part I - General Terms and Conditions A.1.

## V. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Sections A.I.1 and A.II shall be determined in accordance with the following methods:
  - a. Emission Limitation:

4.24 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

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

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where:

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

U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000303, emission factor of , 0.9 lbs emitted/ton of metal processed multiplied by 24.3 tons of metal processed /hr maximum).

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

Applicable Compliance Method:

Compliance with the above limitations is based on the 24.3 tons of metal processed being the maximum potential process rate for this emissions unit.

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b. Emission Limitation:

The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions units: P017, P910, P901, and P911 shall not exceed 11.25 tons (PE)/ rolling 12-month period.

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

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

where:

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

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

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

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

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

Applicable Compliance Method:

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

c. Emission Limitation:

The particulate emissions (PE) from baghouse # 7, which controls emissions from emissions units P908, P910, P901, P076, and P911 shall not exceed 13.83 tons (PE)/ rolling 12-month period.

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

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

where:

Emissions Unit ID: P910

AER = Particulate emissions, in tons per rolling 12 month period;  
 Af = Maximum Air Flow from Baghouse # 7, in acfm, (89,655, specific acfm rates are from the data provide by Honda);  
 Ef = Emission factor of the control device, grains of PE per dscf, (0.005 grains/dscf, data from Honda and represents a voluntary restriction that Honda has requested to be limited to);  
 Cf = Conversion factor, (1 lbs/7,000 grains); and  
 Ho = Allowable rolling 12-month hours of operation limitation, (7,200 hrs, Honda's requested voluntary limitation).

Applicable Compliance Method:

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

d. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P910, shall not exceed 2.48 tons (PE)/ rolling 12-month period.

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

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

where:

FER = Fugitive Particulate emissions, in tons per rolling 12 month period;  
 MSR = Maximum metal processed rate, in tons, (110,230 tons, from the data provide by Honda);  
 Ef = Emission factor, in lbs of PE/ton of metal, (0.9 lbs/ton of metal, Fire SCC 304000303); and  
 CAP = Assumed capture efficiency, in %, (95.0% (0.950)), from data provided by Honda).

Applicable Compliance Method:

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

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 the issuance date of this permit or within 1 year prior to this facilities' Title V expiration,

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which ever occurs first.

- 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.

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

**Honda of America Mfg Inc**  
DTI Application: 05 12644

**Facility ID: 0575000174**

Emissions Unit ID: P910

District Office.

**VI. Miscellaneous Requirements**

None

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**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.

**Operations, Property, and/or Equipment - (P910) - Holding furnace, controlled by baghouses.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	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

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

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

**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 - (P911) - Transfer ladles from holding furnaces to pouring lines controlled by baghouses.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid PSD)	<p>The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P911 Transfer Ladles, shall not exceed 11.25 tons (PE)/ rolling 12-month period.</p> <p>The particulate emissions (PE) from baghouse # 7, which controls emissions from emissions unit P908, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P076 Sand Plant, P911 Transfer Ladles, shall not exceed 13.83 tons (PE)/ rolling 12-month period.</p> <p>The fugitive emissions from P911 shall not exceed 0.77 tons of PE/ rolling 12-month period.</p> <p>See section I.2.a. thru 2.c.</p> <p>See Section II.2</p>
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.
OAC rule 3745-17-11(B)(1)	The PE emissions shall not exceed 2.92 lbs per hour.

**2. Additional Terms and Conditions**

- 2.a Permit to Install 05-13641 for this emissions unit takes into account the use of a

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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.

- 2.b** This emission unit shall be enclosed (inside a building) in such a manner to minimize or eliminate any emissions that may be emitted through the building exhausts into the ambient air.
- 2.c** Nothing in this permit shall preclude the permittee from routing emissions from this emissions unit to other dust collectors or stacks, or to route emissions from other emissions units to the dust collectors and stacks associated with this emission unit as long as the control device associated the stack it is vented to has demonstrated an emission rate of 0.005 grains of PE/dscf or less.

**II. 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. This The maximum annual production rate for this emissions unit shall not exceed 103,000 tons of metal processed, based upon a rolling,12 month summation of the production rates.

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

- 1. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 5 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 5, in grains per dry

Emissions Unit ID: P911

standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;

- e. the monthly PE from baghouse #5, in tons, (the summation of:  $\{[("d" \times 72,948 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a"\} / 2,000 \text{ lbs/ton}$ ));
- f. the rolling, 12-month total PE from baghouse # 5. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).

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2. The permittee shall maintain monthly records of the following information:
  - a. the total operating hours;
  - b. the rolling, 12-month total operating hours for this emissions units. The rolling, 12-month summation of the total operating hours for this emissions unit (the total operating hours for the current month ("a") plus the total operating hours for the 11 previous calendar months);
  - c. the hours that baghouse # 7 was operated;
  - d. the particulate emissions (PE) rate from baghouse # 7, in grains per dry standard cubic feet (g/dscf), 0.005 g/dscf or result from most recent stack test;
  - e. the monthly PE from baghouse #7 in tons, (the summation of:  $\{[("d" \times 89,655 \text{ acfm}) \times (60 \text{ mins/hr}) \times (1\text{lb}/7,000)] \times "a" \} / 2,000 \text{ lbs/ton}$ );
  - f. the rolling, 12-month total PE from baghouse # 7. The rolling, 12-month summation of the total amount of PE (the total amount of PE for the current month ("e") plus the total amount of PE for the 11 previous calendar months).
  
3. The permittee shall maintain monthly records of the following information:
  - a. the amount of metal employed in this emissions unit, in tons;
  - b. the rolling, 12-month total metal employed in this emissions unit. The rolling, 12-month summation of the total sand employed (the total amount of metal employed for the current month ("a") plus the total amount of metal employed for the 11 previous calendar months);
  - c. the monthly fugitive PE emissions, in tons, (the summation of:  $\{[(\text{metal processed } "a" \times 0.6 \text{ lbs/ton of metal, Fire SCC 304000315}) \times (1 - \text{hooding capture efficiency } (97.5\%), \text{ best engineering assumption})] / 2000 \text{ lbs/ton}\}$ ; and
  - d. the rolling, 12-month total fugitive PE from this emissions unit. The rolling, 12-month summation of the total fugitive PE (the total amount of fugitive PE for the current month ("c") plus the total amount of fugitive PE for the 11 previous calendar months).
  
4. The pressure drop across the baghouse shall be maintained within the range of 1 to 15

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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.

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

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify the following:
  - a. all exceedances of combined particulate emissions (PE) from the baghouse #5 which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P911 Transfer Ladles limitation of 11.25 tons (PE)/ rolling 12-month period.
  - b. all exceedances of the combined particulate emissions (PE) from baghouse # 7 (BH-5) , which controls emissions from emissions unit P908, emissions unit

Emissions Unit ID: P911

P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P076 Sand Plant, P911 Transfer Ladles limitation of 13.83 tons (PE)/rolling 12-month period.

- c. all exceedances of the rolling 12-month period metal employed of 103,000 tons per rolling 12-month period in this emissions unit;
- d. all exceedances of the rolling 12-month period fugitive PE limitation of 0.778 tons per rolling 12-month period from this emissions unit;
- e. all exceedances of the rolling, 12-month period 7,200 operation hour limitation; and/or
- f. 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.

These quarterly deviation reports are due by the dates specified in Part I - General Terms and Conditions A.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.

## V. Testing Requirements

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

- a. Emission Limitation:

2.92 lbs of PE/hr

The hourly emission limitation was established by the following methodology:

$$AMR = 0.2 \times U$$

where:

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

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U = Uncontrolled particulate emissions, in lbs/hr (Fire, SCC 304000315, emission factor of , 0.6 lbs emitted/ton of metal processed multiplied by 24.3 tons of metal processed /hr maximum).

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

Applicable Compliance Method:

Compliance with the above limitations is based on the 24.3 tons of metal processed being the maximum potential process rate for this emissions unit.

b. Emission Limitation:

The particulate emissions (PE) from baghouse # 5, which controls emissions from emissions unit P017, emissions unit P910, Holding Furnaces, and the charging and tapping of emissions unit P901, Cupola, P911 Transfer Ladles, shall not exceed 11.25 tons (PE)/ rolling 12-month period.

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

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

where:

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

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

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

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

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

Applicable Compliance Method:

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

Emissions Unit ID: P911

## c. Emission Limitation:

The particulate emissions (PE) from baghouse # 7, which controls emissions from emissions unit P908, emissions unit P910, Holding Furnaces, and charging and tapping of emissions unit P901, Cupola, P076 Sand Plant, P911 Transfer Ladles, shall not exceed 13.83 tons (PE)/ rolling 12-month period.

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

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

where:

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

Af = Maximum Air Flow from Baghouse # 7, in acfm, (89,655, specific acfm rates are from the data provide by Honda);

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

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

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

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Applicable Compliance Method:

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

d. Emission Limitation:

The fugitive particulate emissions (PE) from emissions unit P911, shall not exceed 0.77 tons (PE)/ rolling 12-month period.

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

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

where:

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

MSR = Maximum metal processed rate, in tons, (103,000 tons, from the data provide by Honda);

Ef = Emission factor, in lbs of PE/ton of metal, (0.6 lbs/ton of metal, Fire SCC 304000315); and

CAP = Assumed capture efficiency, in %, (97.5% (0.975)), from data provided by Honda).

Applicable Compliance Method:

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

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 the issuance date of this permit or within 1 year prior to this facilities' Title V expiration, which ever occurs first.
  - 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

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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.

Emissions Unit ID: P911

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.

## VI. Miscellaneous Requirements

None

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**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.

**Operations, Property, and/or Equipment - (P911) - Transfer ladles from holding furnaces to pouring lines controlled by baghouses.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	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

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-13641 Facility ID: 0575000174

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations. CITY/TWP Anna

SIC CODE 3714 SCC CODE \_\_\_\_\_ EMISSIONS UNIT ID P901

EMISSIONS UNIT DESCRIPTION 24.3 ton/hr cupola w/ ventilation to the afterburner and baghouse(the terms of this permit supersede those in PTI 05-02421 issued on 06/08/88).

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	27.37 tons/12mths combined, 0.005 grains/dscf process emissions 0.015 grains/dscf cupola charging emissions	27.37 tons/12mths combined	27.37 tons/12mths combined 0.005 grains/dscf process emissions 0.015 grains/dscf cupola charging emissions	27.37 tons/12mths combined
PM <sub>10</sub>	attainment	27.37 tons/12mths combined	27.37 tons/12mths combined	27.37 tons/12mths combined	27.37 tons/12mths combined
Sulfur Dioxide	attainment	8.75 lbs/hr	19.84 tons/12mths	8.75 lbs/hr	19.84 tons/12mths
Organic Compounds	attainment	1.11 tons/12mths	1.11 tons/12mths	1.11 tons/12mths	1.11 tons/12mths
Nitrogen Oxides	attainment	9.7 tons/12mths	9.7 tons/12mths	9.7 tons/12mths	9.7 tons/12mths
Carbon Monoxide	attainment	4.41 tons/12mths	4.41 tons/12mths	4.41 tons/12mths	4.41 tons/12mths
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Enter Determination:** use of throughput and hours of operation limitations, an afterburner, enclosure, baghouse(s), and emissions rate requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-13641 Facility ID: 0575000174

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations. CITY/TWP Anna

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES  x  NO

IDENTIFY THE AIR CONTAMINANTS:  PE, PM10, SO2, NOx, CO, and VOC

NE  
P1  
FA

Emissions Unit ID: P911

FACILITY DESCRIPTION Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations. CITY/TWP Anna

SIC CODE 3714 SCC CODE EMISSIONS UNIT ID P910  
EMISSIONS UNIT DESCRIPTION Holding furnace controlled by baghouses.  
DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	27.56 tons/12mths combined*	27.56 tons/12mths combined*	27.56 tons/12mths combined*	27.56 tons/12mths combined*
		0.005 grains/dscf	0.005 grains/dscf	0.005 grains/dscf	0.005 grains/dscf
		4.24 lbs/hr	4.24 lbs/hr	4.24 lbs/hr	4.24 lbs/hr
PM <sub>10</sub>	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment				
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

\* Combined controlled emissions from baghouses controlling emissions units P076, P901, P908, P910, and P911.

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: Controlled potential from this individual emissions unit < 10 tons per year, SB265 and OAC rule 3745-31-05(A)(3)(b) BAT does not apply.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES x NO

IDENTIFY THE AIR CONTAMINANTS: PE and PM10

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-13641

Facility ID: 0575000174

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Modification to cupola holding furnace CITY/TWP Anna

Emissions Unit ID: P911

6  
NE  
P1  
FA

Emissions Unit ID: P911

FACILITY DESCRIPTION Modification to cupola, holding furnace and transfer ladles to allow for increases in production and add carbon monoxide emission limitations. CITY/TWP Anna

SIC CODE 3714 SCC CODE EMISSIONS UNIT ID P911  
EMISSIONS UNIT DESCRIPTION Transfer ladles from holding furnaces to pouring lines controlled by baghouses.  
DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	25.85 tons/12mths combined*	25.85 tons/12mths combined*	25.85 tons/12mths combined*	25.85 tons/12mths combined*
		0.005 grains/dscf	0.005 grains/dscf	0.005 grains/dscf	0.005 grains/dscf
		2.92 lbs/hr	2.92 lbs/hr	2.92 lbs/hr	2.92 lbs/hr
PM <sub>10</sub>	attainment				
Sulfur Dioxide	attainment				
Organic Compounds	attainment				
Nitrogen Oxides	attainment				
Carbon Monoxide	attainment				
Lead					
Other: Air Toxics					

\* Combined emissions from baghouse(s) serving P017, P076, P908, P910, and P911.

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Controlled potential from this individual emissions unit < 10 tons per year, SB265 and OAC rule 3745-31-05(A)(3)(b) BAT does not apply.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no  
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES x NO

IDENTIFY THE AIR CONTAMINANTS: PE and PM10