



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**Application No:** 05-14401

**Fac ID:** 0575000174

**DATE:** 1/4/2007

Honda of America Mfg Inc  
Paul Huwer  
12500 MERANDA RD  
ANNA, OH 453029699

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 **\$750** 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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 05-14401**

Application Number: 05-14401  
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 453029699

Location of proposed air contaminant source(s) [emissions unit(s)]:

**12500 Meranda Rd  
Anna, Ohio**

Description of proposed emissions unit(s):

**Modification to PTI: 05-11476 (P025) to add 2 new core making machines and increase tsand throughput.**

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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Laura Powell  
Acting Director

Honda of America Mfg Inc

Facility ID: 0575000174

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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

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permittee shall comply with the requirement to register such a plan.

#### 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

#### 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

#### 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 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.

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**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.
  - 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

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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 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.

#### 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

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this permit.

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

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit 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 of any transfer of this permit.

**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

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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**

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)**

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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.

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**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	11.47
Ammonia	25.5
VOC	1.32

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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 - (P025) - LPDC Core making machines. (Modification to Permit 05-11476 issued 7/31/2001)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.62 lb Particulate Emissions(PE)/hr, and 11.47 tons PE/year; 5.83 lb Ammonia/hr, and 25.5 tons Ammonia/year; 0.3 lb Volatile Organic Compounds(VOC)/hr, and 1.32 tons VOC/year  10% Opacity, as a six minute average, from the stack.  Ohio Toxic Policy
OAC 3745-21-07 (G)	Use of only non-photochemically reactive materials or materials exempt under 3745-21-07 (G)(9).
OAC 3745-17-07 (A)(1)	Less stringent than OAC rule 3745-31-05
OAC rule 3745-17-11(B)(1)	Less stringent than OAC rule 3745-31-05 (A)(3)

**2. Additional Terms and Conditions:**

- 2.a The hourly PE, Ammonia and OC limits were established at maximum designed usage and production, and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit.
- 2.b The permittee may vary the types of sand used so long as the ammonia emission rate from the sand does not exceed the limitations listed in section III.A.1.
- 2.c The resin coated sand used in this process contains various amounts of phenol and formaldehyde. Emissions of these pollutants are presumed to be "0" (zero) based on information from the manufacturer.
- 2.d This emission unit shall use only non-photochemically reactive materials or materials exempt under 3745-21-07 (G)(9).

Emissions Unit ID: P025

- 2.e** BAT will be demonstrated by using only non-photochemically reactive materials or materials exempt under 3745-21-07 (G)(9), low VOC parting sprays, and good work practices to minimize releases to the environment.

## II. Operational Restrictions

1. The LPDC Core Making Machines resin coated sand throughput shall not exceed 5206 pounds of resin coated sand per hour. Compliance with this limit shall be determined by the following calculation:

(Core Weight (by core type) x (Maximum Cores Per Hour (per machine)) x (Number of Machines) = Maximum Sand Usage

## III. Monitoring and/or Recordkeeping Requirements

1. Permittee shall maintain monthly records of the following information:
  - a. The total resin coated sand throughput for each month.
  - b. The annual, 12-month summation of the resin coated sand throughput.
  - c. The Maximum calculated process rate of sand per hour.  
(No hourly recordkeeping required. Calculated process rate limits hourly mass of sand used.)

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the hourly throughput limitation.
2. The permittee shall submit deviation (excursion) reports which identify any use of a photochemically reactive material not exempted in 3745-21-07 (G)(9), including an identification of the material used, its composition, and the amount of the material used.
3. These reports, as denoted in terms A.IV.1. and 2., are due by the date described in Part 1- General Terms and Conditions of the permit under section (A) (1).

## V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:

Emissions Unit ID: P025

11.47 tons PE/ year

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Annual Emissions} = \{[(\text{MSUR}) \times (\text{MOH}) / 2000] \times \text{PEER}\} / 2000$$

where:

MSUR = Maximum Melt Usage Rate (5206 pounds of sand per hour, based on the maximum calculated process rate of sand per hour);

MOH = Maximum Operating Hours (8760 Hours per Year); and

PEER = the PE Emission rate (1.0 lb PE/ton of sand, based on 01/26/99 Emission Test of AEP source P025).

Compliance shall be assumed as long as the maximum sand throughput does not exceed 5206 lbs of sand per hour based on both the maximum calculated process rate of sand per hour and the recordkeeping requirements in section III. c. above.

Since these limits reflect the maximum calculated process rate of sand per hour, no additional compliance determination is required.

## b. Emission Limitation:

2.62 lbs PE/ hour

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Hourly Emission Rate} = (\text{MSUR} / 2000) \times \text{PEER}$$

where:

MSUR = Maximum Sand Usage Rate (5206 pounds of sand per hour, based on the maximum calculated process rate of sand per hour); and

PEER = the PE Emission rate (1.0 lb PE/ton of sand, based on 01/26/99 Emission Test of AEP source P025).

Compliance shall be assumed as long as the maximum sand throughput does not exceed 5206 lbs of sand per hour based on both the maximum calculated process rate of sand per hour and the recordkeeping requirements in section III. c. above.

Since these limits reflect the maximum calculated process rate of sand per hour, no additional compliance determination is required.

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c. Emission Limitation:

25.5 tons Ammonia/ year

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Annual Emissions} = \{[(\text{MSUR}) \times (\text{MOH}) / 2000] \times \text{AER}\} / 2000$$

where:

MSUR = Maximum Sand Usage Rate, (5206 pounds of sand per hour, based on the maximum calculated process rate of sand per hour);

MOH = Maximum Operating Hours, (8760 Hours per Year); and

AER = the Ammonia Emission rate (2.24 lb Ammonia/ton of sand, based on information provided by the resin coated sand supplier).

Compliance shall be assumed as long as the maximum sand throughput does not exceed 5206 lbs of sand per hour based on both the maximum calculated process rate of sand per hour and the recordkeeping requirements in section III. c. above.

Since these limits reflect the maximum calculated process rate of sand per hour, no additional compliance determination is required.

d. Emission Limitation

5.83 lbs Ammonia/ hour

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Hourly Emission Rate} = (\text{MSUR} / 2000) \times \text{AER}$$

where:

MSUR = Maximum Sand Usage Rate (5206 pounds of sand per hour, based on the maximum calculated process rate of sand per hour); and

AER = the Ammonia Emission rate (2.24 lb Ammonia/ton of sand, based on

Emissions Unit ID: P025

information provided by the resin coated sand supplier).

Compliance shall be assumed as long as the maximum sand throughput does not exceed 5206 lbs of sand per hour based on both the maximum calculated process rate of sand per hour and the recordkeeping requirements in section III. c. above.

Since these limits reflect the maximum calculated process rate of sand per hour, no additional compliance determination is required.

e. Emission Limitation:

1.32 tons OC/ year

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Annual Emissions} = [(\text{PSU}) \times (\text{PSOC}) \times (\text{Density}) \times (\text{MOH})] / 2000$$

where

PSU = Parting Spray Usage (1.45 gallons per hour)

PSOC = Parting Spray Organic Content (0.03 lb VOC/gallon)

Density = Density of Parting Spray (8.26 lb / gallon)

MOH = Maximum Operating Hours (8760 Hours per Year)

Since these limits reflect the maximum designed usage per hour, no additional compliance determination is required.

f. Emission Limitation:

0.3 lbs OC/ hour

Applicable Compliance Method:

Compliance shall be assumed based on the following calculation:

$$\text{Hourly Emission Rate} = (\text{PSU}) \times (\text{PSOC}) \times (\text{Density})$$

where

PSU = Parting Spray Usage (1.45 gallons per hour)

PSOC = Parting Spray Organic Content (0.03 lb VOC/gallon)

Density = Density of Parting Spray (8.26 lb / gallon)

Since these limits reflect the maximum designed usage per hour, no additional compliance determination is required.

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g. Emission Limitation:

10% Opacity, as a six minute average, from the stack.

Applicable Compliance Method:

If requested, 40 CFR Part 60, Method 9, with opacity readings taken from the stack.

**VI. Miscellaneous Requirements**

None

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

**B. State Only Enforceable Section**

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

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

**Operations, Property, and/or Equipment - (P025) - LPDC Core making machines. (Modification to Permit 05-11476 issued 7/31/2001)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Ammonia

TLV (mg/m3): 17.41 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 5.83 lbs ammonia/hr

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

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208.3 ug/m3

MAGLC (ug/m3): 414.5 ug/m3

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (inks, coatings, adhesives, or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new

Emissions Unit ID: P025

pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 05-14401 Facility ID: 0575000174

FACILITY NAME Honda of America Mfg Inc

FACILITY DESCRIPTION Modification to PTI: 05-11476 (P025) CITY/TWP Anna  
to add 2 new core making machines  
and increase sand throughput.

SIC CODE 3714 SCC CODE 3 04 003 19 EMISSIONS UNIT ID P025

EMISSIONS UNIT DESCRIPTION LPDC Core making machines. (Modification to Permit 05-11476 issued  
7/31/2001)

DATE INSTALLED upon issuance

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	2.62 lb/hr	11.47	2.62 lb/hr	11.47
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	0.3 lb/hr	1.32	0.3 lb/hr	1.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	ammonia	5.83 lb/hr	25.5	5.83 lb/hr	25.5

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?****Enter Determination** Due the very low level of particulate emissions from this operation, it is not economically feasible to operate a scrubber to reduce particulate emissions. Allowable emissions are based on 8760 Maximum potential.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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\*? X YES      NOIDENTIFY THE AIR CONTAMINANTS: Ammonia, organic compound, and particulate