

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: "05-14380"

A. Source Description:

Honda Manufacturer of American, has an engine production plant at 12500 Meranda Rd., Anna, Shelby County, Ohio. This Permit to Install (PTI) is to cover the installation of a new melting and casting operation. At present, this facility is defined as a Minor Source under PSD regulations.

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, at this time, for all criteria pollutants thresholds under Prevention of Significant Deterioration (PSD) standards.

C. Source Emissions:

This PTI will cover the installation of new emission units for the new Casting Line III. This line contains 3 new emission units that include:

1. **P920, Ferrous Casting Line III, Melting Operation.** This emission unit will have hooding that will maximize the amount of emissions are vented to baghouse(s), with a emission flow rate of 0.005 lbs/dscf or less. The emissions that are not captured by the hooding will be reduced by the building enclosure prior to being emitted into the ambient air. There are also 12-month rolling limitations on both the amount of hours of operation and amount of metal processed.
2. **P921, Ferrous Casting Line III, Casting Operation.** This emission unit will have hooding that will maximize the amount of emissions are vented to baghouse(s), with a emission flow rate of 0.005 lbs/dscf or less. The emissions that are not captured by the hooding will be reduced by the building enclosure prior to being emitted into the ambient air. There are also 12-month rolling limitations on both the amount of hours of operation and amount of metal processed.
3. **P922, Ferrous Casting Line III, Gate Cutting Operation.** This emission unit will have hooding that will maximize the amount of emissions are vented to baghouse(s), with a emission flow rate of 0.005 lbs/dscf or less. The emissions that are not captured by the hooding will be reduced by the building enclosure prior to being emitted into the ambient air. There are also 12-month rolling limitations on both the amount of hours of operation and amount of metal processed.

D. Conclusion:

Honda's Anna, Ohio, Engine Production Plant, is defined as a minor source for Federal Regulation under PSD. Honda is working with the Ohio EPA to develop Federally Enforceable limitations on their existing operations to assure that the CO emissions does not trigger PSD requirements. In this PTI, Honda has requested: an annual throughput limitation of 12,800 tons of metal / 12-month rolling period; limitation of hours of operation to 7,200 hours per 12-month rolling period; and that the emissions from these emission units be captured and reduced by the use of hooding, enclosure, and baghouse(s) with an emission flow rate of 0.005 lbs/dscf or less.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL

SHELBY COUNTY

Application No: 05-14380

Fac ID: 0575000174

DATE: 8/1/2006

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

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1500** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

SHELBY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 05-14380 FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America Mfg Inc**

On 8/1/2006 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 05-14380:

Electric Holding Furnace, Casting Line 3, and Gate Cutting with Baghouses.

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]



DRAFT PERMIT TO INSTALL 05-14380

Application Number: 05-14380
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):
Electric Holding Furnace, Casting Line 3, and Gate Cutting with Baghouses.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (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.

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.

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.
 - 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 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 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 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 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)**

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>
Particulate (PE)	9.24
PM10	2.72
Lead	0.02

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B) and 3745-17-08(B) do not apply to the fugitive emissions from the affected emissions units at this facility.
2. The particulate emissions (PE) from baghouse BH-1 serving emissions units P018, P056, P058, and P904 shall not exceed 0.005 grain/dry standard cubic foot (dscf) of the total exhaust gases.

The PE from baghouse BH-3 serving emissions units P018, P056, P057, and P061 shall not exceed 0.005 grain/dscf of the total exhaust gases.

The PE from baghouse BH-7 serving emissions units P076, P901, P905, and P908 shall not exceed 0.005 grain/dscf of the total exhaust gases.

The permittee reserves the right to direct the PE from any other existing or new emissions units to these baghouses with the understanding that emissions will not exceed 0.005 grain/dscf of the total exhaust gases and/or individual emission unit's permitted allowable emission limitation.

This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to Ohio EPA within 30 days after the change(s) documenting the change(s). This information would include, but not limited to, the following: a description of which emissions units were redirected to which baghouse, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to OAC rule 3745-31-01.

3. Reference to 40 CFR Part 63, Subpart EEEEE (Iron & Steel Foundry MACT). The Anna Engine Plant (AEP) is in the process of evaluating if it is a major source of Hazardous Air Pollutant Emissions. AEP will finalize this determination prior to the 4/22/07 Subpart EEEEE compliance deadline. If AEP determines that they are a major source of HAP emissions, they shall comply with the requirements of Subpart EEEEE prior to the 4/22/07 deadline.

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 - (P920) - Line 3 QCC 2 Melt, Electric Holding Furnace, w/ Transfer Ladles equipped with baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The particulate (PE) emissions from any baghouse that controls or has the potential to control this emission unit shall not exceed 0.005 grain of PE/dscf.</p> <p>The calculated PE emissions shall not exceed 1.34 lbs/hr.</p> <p>The calculated PM10 emissions shall not exceed 0.57 lbs/hr.</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>
OAC rule 3745-31-05(C)	PE emissions shall not exceed 3.17 tons per 12 month rolling period and PM-10 emissions shall not exceed 0.91 tons per 12 month rolling period. See section A.II.1 and 2.
OAC rule 3745-17-07(A)(1)	The visible limitation specified by this rule are equal to or less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

Issued: To be entered upon final issuance

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR Part 63, Subpart EEEEE	Reference to 40 CFR Part 63, Subpart EEEEE (Iron & Steel Foundry MACT). The Anna Engine Plant (AEP) is in the process of evaluating if it is a major source of Hazardous Air Pollutant Emissions. AEP will finalize this determination prior to the 4/22/07 Subpart EEEEE compliance deadline. If AEP determines that they are a major source of HAP emissions, they shall comply with the requirements of Subpart EEEEE prior to the 4/22/07 deadline.

2. Additional Terms and Conditions:

- 2.a** The PE from this emissions unit 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** 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.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Maximum Allowable

<u>Months</u>	<u>Cumulative Operating Hours</u>
1	744
1-2	1416
1-3	2160
1-4	2880
1-5	3624
1-6	4344
1-7	5088

Honda of America Mfg Inc

PTI Application: 05-14380

Issued: To be entered upon final issuance

Facility ID: 0575000174

Emissions Unit ID: P920

1-8	5832
1-9	6552
1-10	7200
1-11	7200
1-12	7200

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

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

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Maximum Allowable

<u>Months</u>	<u>Cumulative Production</u>
1	2,976
1-2	5,664
1-3	8,640
1-4	11,520
1-5	12,800
1-6	12,800
1-7	12,800
1-8	12,800
1-9	12,800
1-10	12,800
1-11	12,800
1-12	12,800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be 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 production rate for each month, in tons of metal processed;
 - b. the rolling, 12-month summation of the production rates, in tons of metal processed;

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

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.).

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

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

- 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate, and/or rolling, 12-month limitation on the hours of operation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate and/or hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.
3. The deviation and/or quarterly 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 in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

1.34 lb PE/hr and 3.17 tons per rolling 12-months combined emissions.

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$HER=[(BFR)(Ec)(TI)(CONV)]+[\{[MHMR*[(Fce)+(Me)+(Tpe)+(Tte)]\}*(1-Cp\%)]+(MHMR*Tfe)*(1-Cb\%)]$$

$$AER=(\{[(BFR)(Ec)(TI)(CONV)]*AH\}+[\{[MAMR*[(Fce)+(Me)+(Tpe)+(Tte)]\}*(1-Cp\%)]+(MAMR*Tfe)*(1-Cb\%)]/2000$$

where:

HER= Hourly Emission Rate, lbs/hr;

AER= Annual Emission Rate, tons/yr;

Baghouse Emissions:

BFR = baghouse flow rate (12,002 acfm, from Honda's Calculation Sheets);

Ec = Emission concentration rate (0.005 grain /dscf, from Honda's PTI Application and Calculation Sheets);

TI = time (60 minutes/hr); and
CONV = conversion factor (1 lb/7,000 grains).

Building Emissions:

MHMR = maximum hourly metal (iron throughput) rate (4.0 tons/hr);
MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month);
AH = Annual Hours restriction Rate (7,200 hours of operation per rolling 12-months);
Fce = PM10 emission factor Charging (0.36 lb of PE/ton of metal, from SCC 3-04-003-15, Fire);
Me = Melting Emission Factor (086 lbs/ton, from SCC 3-04-003-3, Fire);
Tpe = Tapping Emission Factor (0.1 lbs/ton, Honda's best estimate)
Tfe = Transfer System Emission Factor (0.36 lbs/ton, from SCC 3-04-003-15, Fire);
Tte = Transfer System Tapping Emission Factor (0.1 lbs/ton, Honda estimate);
Cp% = Capture Efficiency of hooding and venting system (95% from Honda's EAC Form); and
Cb%= Capture/Control of building enclosure (70%, from Honda's calculation sheets and best conservative engineering estimate available).

Compliance with the annual PE limitation is ensured while compliance is maintained with the 12 month rolling annual production limitation and 12 month rolling hour of operation restriction.

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

b. Emission Limitation

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

Applicable Compliance Method

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

c. Emission Limitation

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

Applicable Compliance Method

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

2. The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE and PM10 limitations.
 - a. The emission testing shall be conducted within 6 months of the installation completion.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable PE and PM10 limitations.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations:

PE: Methods 1-5 of 40 CFR Part 60, Appendix A; and

PM10: Method 201 and 202 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.

Honda of America Mfg Inc

PTI Application: 05-14380

Issued: To be entered upon final issuance

Facility ID: 0575000174

Emissions Unit ID: P920

VI. Miscellaneous Requirements

None

Honda of America Mfg Inc
PTI Application: 05-14380
Issued: To be entered upon final issuance

Facility ID: 0575000174
Emissions Unit ID: P920

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 - (P920) - Line 3 QCC 2 Melt, Electric Holding Furnace, w/ Transfer Ladles equipped with baghouse

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

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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 - (P921) - Line III QCC 2 Casting to include Permanent Mold Casting Machine, Pouring Furnace, Pigging Machine and Ancillary Equipment

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The particulate (PE) emissions from any baghouse that controls or has the potential to control this emission unit shall not exceed 0.005 grain of PE/dscf,</p> <p>The calculated PE emissions shall not exceed 1.20 lbs/hr.</p> <p>The calculated PM10 emissions shall not exceed 0.96 lbs/hr.</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>
OAC rule 3745-31-05(C)	PE emissions shall not exceed 2.82 tons per 12 month rolling period and PM-10 emissions shall not exceed 0.96 tons per 12 month rolling period. See section A.II.1 and 2.
OAC rule 3745-17-07(A)(1)	The visible limitation specified by this rule are equal to or less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

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Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR Part 63, Subpart EEEEE	Reference to 40 CFR Part 63, Subpart EEEEE (Iron & Steel Foundry MACT). The Anna Engine Plant (AEP) is in the process of evaluating if it is a major source of Hazardous Air Pollutant Emissions. AEP will finalize this determination prior to the 4/22/07 Subpart EEEEE compliance deadline. If AEP determines that they are a major source of HAP emissions, they shall comply with the requirements of Subpart EEEEE prior to the 4/22/07 deadline.

2. Additional Terms and Conditions

- 2.a** The PE from this emissions unit 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** 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.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Maximum Allowable

<u>Months</u>	<u>Cumulative Operating Hours</u>
1	744
1-2	1416
1-3	2160
1-4	2880
1-5	3624
1-6	4344
1-7	5088

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PTI Application: 05-14380

Issued: To be entered upon final issuance

Facility ID: 0575000174

Emissions Unit ID: P921

1-8	5832
1-9	6552
1-10	7200
1-11	7200
1-12	7200

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

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

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Maximum Allowable

<u>Months</u>	<u>Cumulative Production</u>
1	2,976
1-2	5,664
1-3	8,640
1-4	11,520
1-5	12,800
1-6	12,800
1-7	12,800
1-8	12,800
1-9	12,800
1-10	12,800
1-11	12,800
1-12	12,800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be 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 production rate for each month, in tons of metal processed;
 - b. the rolling, 12-month summation of the production rates, in tons of metal processed;

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

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.).

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

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

- 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate, and/or rolling, 12-month limitation on the hours of operation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate and/or hours of operation . These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.
4. 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 in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

1.20 lb PE/hr and 2.82 tons per rolling 12-months combined emissions.

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$HER = [(BFR) * (Ec) * (TI) * (CONV)] + [((MHMR) * [Ap + Tap + Cc + le + Qp + Tte] * (1 - Cp\%)) + [(Ee^3) * MHMR] * (1 - Cb\%)]$$

$$AER = (((BFR) * (Ec) * (TI) * (CONV)) * AH) + [((MAMR) * [Ap + Tap + Cc + le + Qp + Tte]) * (1 - Cp\%)] + [((Ee^3) * MAMR) * (1 - Cb\%)] / 2000$$

where:

HER= Hourly Emission Rate, lbs/hr;

AER= Annual Emission Rate, tons/yr;

Baghouse Emissions:

BFR = baghouse flow rate (10,500 acfm, from Honda's Calculation Sheets);

Ec = Emission concentration rate (0.005 grain /dscf, from Honda's PTI

Application and Calculation Sheets);

TI = time (60 minutes/hr);

CONV = conversion factor (1 lb/7,000 grains);

AH = Annual Operating hours (7200 per rolling 12-months)

Building Emissions:

MHMR = maximum hourly metal (iron throughput) rate (4.0 tons/hr);

MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month);

Ee=Emissions from Pouring Furnace, Crucible, and Pigging Machine standing (0.1 lbs/ton, based on Honda's estimate and Flow diagram)(uncontrolled emission points)

Ap=Automatic Pour Furnace (0.1 lbs/ton, based Honda's best estimate);

Tap= Tapping Emissions (0.1 lbs/ton, Honda's best estimate);

Cc= Crucible Charging (0.6 lbs/ton, SCC3-04-003-15, Fire);

Ie= Inoculation Emission Factor (5.0 lbs/ton, SCC 3-04-003-22, Fire);

Qp= Quick Pouring Emission Factor (0.1 lbs/ton, Honda's best estimate);

Tte= Transfer System Emission Factor (0.6 lbs/ton, Ap-42 Table 12.5-2);

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

Cb%= Capture/Control of Building (70% from Honda Calculation sheets and best engineering estimate)

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

b. Emission Limitation

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

Applicable Compliance Method

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

c. Emission Limitation

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

Applicable Compliance Method

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

2. The permittee shall conduct, or have conducted, emission testing for any baghouse that controls this emission unit to demonstrate compliance with the allowable PE and PM10 limitations.

a. The emission testing shall be conducted within 6 months of the installation completion.

b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations.

PE: Methods 1-5 of 40 CFR Part 60, Appendix A; and

PM10: Method 201 and 202 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.

Honda of America Mfg Inc

PTI Application: 05-14380

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Emissions Unit ID: P921

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

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 - (P921) - Line III QCC 2 Casting to include Permanent Mold Casting Machine, Pouring Furnace, Pigging Machine and Ancillary Equipment

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

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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 - (P922) - Line III QCC 2 Gate Cut to include Gate Cut Machine, Material Handling and Associated Equipment

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	<p>The particulate (PE) emissions from any baghouse that controls or has the potential to control this emission unit shall not exceed 0.005 grain of PE/dscf.</p> <p>The calculated PE emissions shall not exceed 1.47 lbs/hr.</p> <p>The calculated PM10 emissions shall not exceed 0.17 lbs/hr.</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>
OAC rule 3745-31-05(C)	PE emissions shall not exceed 3.25 tons per 12 month rolling period and PM-10 emissions shall not exceed 0.27 tons per 12 month rolling period. See section A.II.1 and 2.
OAC rule 3745-17-07(A)(1)	The visible limitation specified by this rule are equal to or less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
40 CFR Part 63, Subpart EEEEE	<p>The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>Reference to 40 CFR Part 63, Subpart EEEEE (Iron & Steel Foundry MACT). The Anna Engine Plant (AEP) is in the process of evaluating if it is a major source of Hazardous Air Pollutant Emissions. AEP will finalize this determination prior to the 4/22/07 Subpart EEEEE compliance deadline. If AEP determines that they are a major source of HAP emissions, they shall comply with the requirements of Subpart EEEEE prior to the 4/22/07 deadline.</p>

2. Additional Terms and Conditions

- 2.a** The PE from this emissions unit 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** 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.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Maximum Allowable	
Months	Cumulative Operating Hours
1	744
1-2	1416
1-3	2160
1-4	2880
1-5	3624

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PTI Application: 05-14380

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Emissions Unit ID: P922

1-6	4344
1-7	5088
1-8	5832
1-9	6552
1-10	7200
1-11	7200
1-12	7200

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

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

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Maximum Allowable

Months	Cumulative Production
1	2,976
1-2	5,664
1-3	8,640
1-4	11,520
1-5	12,800
1-6	12,800
1-7	12,800
1-8	12,800
1-9	12,800
1-10	12,800
1-11	12,800
1-12	12,800

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual production rate limitation shall be 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 production rate for each month, in tons of metal processed;
 - b. the rolling, 12-month summation of the production rates, in tons of metal processed;

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

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.).

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

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

- 3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month limitation of the production rate, and/or rolling, 12-month limitation on the hours of operation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate and/or hours of operation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse(s) did not comply with the allowable range.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the area immediately above the capture system serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.
4. 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 in Section A..1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

1.47 lb PE/hr and 3.25 tons per rolling 12-months combined emissions.

Applicable Compliance Method: The combined hourly and rolling 12-month emission limitation was established by the following methodology:

$$HER=[(BFR)(Ec)(TI)(CONV)]+[(MHMR*Cte)(1-Cp)]*(1-Cb\%)]$$

$$AER=(\{[(BFR)(Ec)(TI)(CONV)]*AH\}+[(MAMR*Cte)(1-Cp)]*(1-Cb\%))/2000$$

where:

HER= Hourly Emission Rate, lbs/hr;

AER= Annual Emission Rate, tons/yr;

Baghouse Emissions:

BFR = baghouse flow rate (10,500 acfm, from Honda's Calculation Sheets);

Ec = Emission concentration rate (0.005 grain /dscf, from Honda's PTI Application and Calculation Sheets);

TI = time (60 minutes/hr);

CONV = conversion factor (1 lb/7,000 grains);

AH = Annual Operating hours (7200 per rolling 12-months)

Building Emissions:

MHMR = maximum hourly metal (iron throughput) rate (4.0 tons/hr);

MAMR = maximum annual metal (iron throughput) rate (12,800 tons/rolling 12-month);

Cte= Cutting Emission Factor (17.0 lbs PM / ton, from SCC 3-04-003-40, Fire)

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

and

Cb%= Capture/Control of Building (70% from Honda Calculation sheets and best engineering estimate)

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

b. Emission Limitation

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

Applicable Compliance Method

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

c. Emission Limitation

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

Applicable Compliance Method

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

2. The permittee shall conduct, or have conducted, emission testing for any and all baghouse that this emission unit has or can be controlled by in the future to demonstrate compliance with the allowable PE and PM10 limitations.
 - a. The emission testing shall be conducted within 6 months of the installation completion.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable PE limitations.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission limitations:

PE: Methods 1-5 of 40 CFR Part 60, Appendix A; and
PM10: Method 201 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.

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

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 - (P922) - Line III QCC 2 Gate Cut to include Gate Cut Machine, Material Handling and Associated Equipment

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

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None