



State of Ohio Environmental Protection Agency

Southwest District

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Oct. 5, 2007

CERTIFIED MAIL

Mr. Paul Huwer
Honda of America Mfg., Inc.
12500 Meranda Road
Anna, Ohio 45302-9699

Notice of Violation

RE: July 30, 2007, Deviation Report and excess emissions from emissions unit P902, (Mold Pouring and Cooling Line 1), P017, (Mold Making Line 1), and P020, (Extraction, shakeout, sand separation and cooling operations).

Dear Mr. Huwer:

The purpose of this letter is to convey a concern to you that has been identified during the review of Honda of America Mfg., Inc., Anna, Ohio, facility's July 30, 2007, Quarterly Deviation Report.

In the quarterly report, Honda demonstrates that the actual combined annual emissions from these three emissions units exceed their combined allowable annual emissions by 82.4 tons of carbon monoxide (CO), 0.87 tons of nitrogen oxidizes (NOx), and 11.07 tons of organic compounds. After further review, these exceedances were first reported to this office and the US EPA on the October 25, 2000, Quarterly Deviation Report.

In Honda's July 30, 2007, Deviation Report, Under "*Countermeasures*", Honda states a Permit to Install (PTI) was submitted to this Office, on March 28, 2003. This PTI was submitted to establish new allowable emission limitations that would reflect the actual emission increases. Based on our records, the stated "*Countermeasures*", must be referring to PTI's 05-13639, which was submitted to this office on March 28, 2003. Since December 7, 2005, this office has working to process this PTI and has sent to Honda six proposed draft terms and conditions for this PTI. In proposed Special Terms and Conditions for PTI 05-13639, which also includes emissions unit P075, (Shot blast I), the overall allowable emissions would be 85.98 tons of carbon monoxide (CO), 1.43 tons of nitrogen oxidizes (NOx), and 57.57 tons of organic compound (OC), which would more than address the past and present exceedances and allow for the Honda's desired increase in hours of operations.

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Please be aware that this investigation may be sent to our Central Office for further review and possible enforcement action. The Ohio EPA reserves the right, pursuant to Chapters 3704, 3714, 3734, 3745, and 3750 of the Ohio Revised Code and any other applicable state or federal laws or regulations to seek civil and/or criminal action, reimbursement of response costs and any other appropriate legal or equitable relief for any violation of law.

Please submit to this office, by November 9, 2007, your plans to address these changes and steps Honda plans to take to minimize these exceedances until new allowable emission limits can be established through the issuance of a final PTI and a revised Title V.

If you have any questions or comments, please feel free to contact Craig Osborne, of my staff, at (937) 285-6063.

Sincerely,



Thomas A. Schneider
Supervisor Division of Air Pollution Control,
Southwest District Office

cc: John Paulian, DAPC /CO
Lisa Holscher U.S. EPA, Region V

TAS/CO/ca