



State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 18, 2007

RE: Pretreatment Inspection and
Notice of Violation

Ms. Lee Sanders
Honda Transmission Mfg.
6964 State Route 235 N.
Russells Point OH 43348

Dear Ms. Sanders:

On June 12, 2007 I met with you and Mr. Ken Campbell to conduct a pretreatment inspection at your facility. A review of your available self-monitoring reports since my previous inspection revealed that Honda Transmission has violated its limits for Phenolics on the following occasions:

Date	Limit (ug/l)	Result (ug/l)
March 3, 2006	1,371	2,428
March 2006	1,368	2,428
April 2006	1,368	1,370
July 14, 2006	1,371	2,100
July 2006	1,368	2,100
September 1, 2006	1,371	1,711
September 2006	1,368	1,711
October 9, 2006	1,371	1,578
October 2006	1,368	1,578

With the completion of the new pretreatment system that features activated carbon specifically for removing phenolics, it is anticipated that these violations will be remedied. As such, there is no need for you to address these violations.

The new pretreatment system was in the final stages of installation. Although there was a lot of construction equipment and activity at the time of my visit, I still found the access to the strainer and oil water separator seemed somewhat inconvenient and cramped; I hope that their location doesn't cause any operational or maintenance problems.

Ms. Lee Sanders
July 18, 2007
Page 2

During our walk-through of the new forging area that is ready to begin production, it became apparent that a breakdown of individual sources of wastewater within forging, including cooling tower blowdowns, is necessary to properly characterize these operations. Aside from identifying sources, the diagram should provide an estimate of daily flow, the volumes and frequencies of periodic discharges and the destinations of all discharges. Please provide this information, in the form of a diagram, by August 17th.

Finally, you indicated that impregnation of transmission cases is currently being conducted off-site by another company on a trial basis until approximately September. If performance and economic criteria are met, this operation may be eliminated from your facility. This would have a significant impact on pretreatment as wastewater from impregnation has always been challenging to manage. It will be very important for you to inform me if this operation is discontinued at your facility.

Thank you for providing me so much of your time to review your expansive facility. If you have any questions concerning this letter or the inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Pretreatment Coordinator
Division of Surface Water

ENCLOSURES

CC: Ronald Jacob - Indian Lake Sewer District
Julia Zhang - Ohio EPA / Central Office / DSW



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

PERMIT NUMBER 1DP00009*GP	FACILITY NUMBER OHP000075	DATE CONDUCTED June 12, 2007		
INSPECTION TYPE I	INSPECTOR S	FACILITY TYPE 2	TIME IN 1015	TIME OUT 1600

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY Honda Transmission Manufacturing, Inc. 6964 State Route 235 North Russells Point, OH 43348	POTW RECEIVING DISCHARGE Logan County Sewer District - Indian Lake WWTP
--	---

MAILING ADDRESS OF FACILITY
**Honda Transmission Manufacturing, Inc.
6964 State Route 235 North
Russells Point, OH 43348**

CONTACT (NAME/TITLE/PHONE)
Ms. Lee Sanders / Environmental Coordinator / (937) 843-5555 ext. 63948

FACILITY EVALUATION (See Inspection letter for more complete description)

(S = Satisfactory, M = Marginal, U = Unsatisfactory, NA = Not Applicable)

S	Sampling Procedures	NA	Compliance schedule requirements
M	Monitoring / Reporting	S	Notification
U	Compliance with effluent limits	-	Other -

Name and Signature of Inspector(s) Matt Walbridge	Agency / Office / Telephone Ohio EPA / Southwest District Office / (937) 285-6095	Date 7-18-07
Signature of Reviewer 	Ohio EPA / Southwest District Office / (937) 285-6034	Date 7/18/07

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: *Honda Transmission Manufacturing, Inc.*

Date of inspection: *June 12, 2007*

Facility Number: *OHP000075*

IDP Number: *1DP00009*GP*

Facility Representative: *Ms. Lee Sanders and
Mr. Ken Campbell*

Inspector(s): *Matt Walbridge*

COMPLIANCE

1. Date of last pretreatment inspection: *August 24, 2006*
2. Has the facility been in compliance with its permit limits since the last inspection? Y / N
If no, explain:
3. Is the facility in compliance with all other requirements?
Sampling procedures Y / N / NA
Reporting (late reporting, failure to report, etc) Y / N / NA
Compliance schedules Y / N / NA
Submitted BMR and 90 day compliance reports Y / N / NA
Any other requirements Y / N / NA
If any of the above five answers is no, explain:
4. Was the facility required to perform any actions as a result of the last inspection? Y / N
Explain any unresolved actions: *None.*

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: *~1,400 (~1,000 in production)*
6. Shifts/Day: *3 (Assembly 2 shifts, DTX 1 shift)*
7. Production Days/Year: *279*
(Shutdown occurs during the first week in July and the week between Christmas and New Years.)
8. Hours/shift: *8*
9. Any production changes since the last inspection? Y / N
If yes, explain:
*Automatic Transmission Gear operations are continuing to ramp up.
Forging and 4WD are coming on-line in August/September.*
*Impregnation flows are down significantly. Impreg is being done off-site and this operation could
be gone in September if off-site impreg proves to be effective.*
10. General facility description and operations:
*Manufacture automotive transmissions and differentials. Operations include die casting,
machining shot peening, carburizing heat treatment (with oil quench and vapor degreasing),
forging and assembly.*

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y /N

If yes, explain: *Impreg could be gone in September if off-site impreg proves to be effective.*

12. Any expansion or production increase expected within the next year? Y /N

If yes, explain:

New drive train expansion (DTX) will continue to ramp up (rate and target are not known). Operations include machining, shot peening, carburizing heat treatment (with oil quench and vapor degreasing). Forging operations are expected to be in full production in August and 4WD by September.

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

Wastewaters from automatic transmission and gear manufacturing combine at the existing pretreatment building and flow through two micro screen strainers. From the strainers, wastewater flows to an oil/water separator and on to an 87,000-gallon equalization tank.

Wastewater from impregnation is pumped to a holding tank (for flow equalization) and then into a conical-bottomed mixing tank where caustic and polymer are added to cause impregnation solids to coagulate. The solids-bearing waste water is then pumped through a plate-and-frame filter press with filtrate directed to the 87,000-gallon EQ tank. From the EQ tank wastewater is pumped to three ultra filtration systems.

Permeate from the UF units flow to a collection tank and then pumped through a flow meter and two 2,000-pound activated carbon filters prior to discharge to the lift station serving the facility.

Oily retentate from the UF units (and oil from the separator) are discharged to oil frac tanks.

14. Was a PTI issued for the treatment system? Y /N

15. Were there any modifications to the treatment system since the previous inspection? Y /N

If yes, was a PTI obtained? Y /N

PTI Number: **598142**

Date: **March 14, 2007**

16. What is the treatment mode of operation? ~~Batch~~ / ~~Continuous~~ / Combination

All of the wastewater is treated in a continuous mode whereas the impregnation wastewater is treated in a combination of batch/continuous. Continuous treatment occurs 24 hours a day for four or five days.

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?

*Jeff Noble (w/ Nalco), Jeremy Roestefer, Mike Merlat
Ken Campbell - is available as backup.
Mr. Noble maintains the system in excellent condition.*

Nalco is the second year of a 5-year contract with Honda.

18. How often is the treatment system checked?

Throughout an 8-hour shift by the operator and during all other times via plant security guards using a security key system. The guards have guidance on what to look for and how to respond.

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? Y/N
 Explain:

Level, temperature and pressure. There is a level alarm on the outdoor storage tank (80% full). Pressure alarms (automatically shuts off the UF system), temperature alarms to ensure optimum oil separation.

20. Is there an operations and maintenance manual? *(in development as part of new system)* ~~Y/N~~

21. Is an inventory of critical spare parts maintained? Y/N
 If yes, list:

UF tubes and recirculation pumps.

22. Are there any bypasses in the system? Y/N
 If yes, describe the location:

Have bypasses occurred since the last inspection? N.A. Y/N

Was the POTW notified? N.A. Y/N

23. Are residuals or sludges generated? Y/N

Metal chips, oils, filter press sludge, aluminum swarfe, dross, flash, scale from forging, knockouts from stamping, spent glass and steel shot.

Method of disposal:

Hauled off-site.

Frequency and amount of disposal:

Honda Transmission is being asked to provide this information.

Name of hauler/landfill/disposal facility:

Clean Water Limited takes the liquids, Cherokee Run Landfill takes the WWTP sludge, Wabash takes the chips and dross and Omnisource takes the swarfe.

Is any sludge generated subject to RCRA regulations? *(Conditionally exempt with zero lbs/year)* ~~Y/N~~

If land applying sludge, is there a sludge management plan? N.A. Y/N

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. Parts Washing ⁽¹⁾	Discharge from the Granular Activated Carbon Filters	28,392	ND*	N.A.	N.A.
2. Mop Station ⁽¹⁾					
3. Forging ⁽¹⁾					
4. Impregnation Sealant ⁽¹⁾ (9,000 gpd - measured)		7,754	-4,000 (measured)	92,000 lbs /day	~90,000 lbs/day
5. Die Casting					
6. Die Maintenance					
7. Cast Quench					
Total Regulated Process Flow		36,146 +	-12,800*	+ Although not a limit.	
Noncontact Cooling	-	-	-	* There isn't a flow history reflective of all operations since wastewater has been hauled off waiting for the new pretreatment system to be installed. ⁽¹⁾ These sources are treated as if they were regulated by Metal Finishing even though there is no core Metal Finishing operation.	
Boiler Condensate	-	-	-		
Reverse Osmosis	-	-	-		
Demineralizer Regeneration	-	-	-		
Softener Backwash	-	-	-		
Filter Backwash	-	-	-		
Compressor Condensate	-	-	-		
Total of Dilute Flows	N.A.	4,876	ND*		
Sanitary	(2)	(2)	(2)		
TOTAL FLOW	N.A.	41,022	-12,800⁽³⁾		

(2) Sanitary wastewater is discharge through separate sewer lateral.

(3) Based on most-recent self-monitoring reports.

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any).

SELF MONITORING

26. Sample location(s) described in the facility's permit:

"Samples for outfall 1DP00009001 shall be collected at the discharge from the Granular Activated Carbon Vessels."

"Samples from outfall 1DP00009601 shall be collected at the influent to the Oil/Water Separator."

"Samples from outfall 1DP00009603 shall be collected at the impregnation water prior to treatment."

27. Is the facility sampling at the location(s) described in the permit? Y / N
 If no, describe the actual location:

28. Is the location(s) where the facility is sampling representative? Y / N
 If no, indicate a representative location:

29. Is the flow measured or estimated? Measured / Estimated

(Using a paddle wheel meter but are looking to install a magmeter soon)

If measured, how often is the meter calibrated?

Not determined. Still need to contact the manufacturer and determine the necessary frequency. Honda Transmission will again be asked to follow up on this issue.

If estimated, describe method of estimation:

30. Is pH monitored continuously? Y / N

If yes, how often is the meter calibrated?

Not determined. Buffer solutions are onsite.

31. Does the facility collect its own samples? Y / N
 If no, specify the sample collector:

Ginosko. They set up to sample from Thursday to Friday once per month.

32. Are appropriate sampling procedures followed? Y / N

Monitoring frequencies Y / N

Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / N

Flow proportioned samples *(the flow rate is constant throughout the day.)* Y / N

Proper preservation techniques *(although samples are not iced during collection)* Y / N

Sample holding times Y / N

Chain-of-custody forms Y / N

33. Are samples analyzed in accordance with 40 CFR 136? Y / N

34. Laboratory conducting analyses: **Ginosko (Looking to possibly go with MASI)**

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility?
If yes, identify organics: Y/N
36. Does the facility have a current toxic organic management plan(TOMP)? Y/N
If yes, is it being implemented? NA Y/N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: Y/N
38. Does the facility need a spill prevention plan or slug discharge control plan? Y/N
If yes, does the facility have a written plan? NA Y/N
39. Identify any potential slug load or spill areas:

None - all process wastewater is collected in tanks and discharge can only occur after passing through UF and activated carbon.

They maintain a SWPPP

GENERAL OBSERVATIONS

- 1. Impregnation of castings are being sent off-site. This may continue if performance is good and is makes economic sense.*
- 2. Forging operations are getting ready to start up. Lubricant (Fuchs lube) is sprayed onto hot billets and is expected to be discharged during shutdowns. A water quench follows with a closed-loop chiller for the induction heat treat furnace.*

Approximately ten billets at start-up every morning are sent to a quench tank with a discharge but they are looking to use a dead rinse tank to eliminate the need for a discharge.

- 3. There is a die wash station for forging that is used twice per shift. It has a closed-loop filtering system with discharge from the system occurring during plant shutdowns.*

REQUIRED FOLLOW-UP ACTIONS

See inspection letter.

