OhioEPA
State of Ohio Environmental Protection Agency

Southwest District Office

401 E. Fifth St.
Dayton, Ohio 45402

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

July 15, 2009

RE: Pretreatment Inspection

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

Dear Ms. Sanders:

On June 10, 2009 I met with you and Ken Campbell to conduct a pretreatment inspection at your facility. A review of your self-monitoring reports for the period of July 2008 through June 2009 revealed no limit violations. However, in February and May 2009 Honda Transmission failed to conduct monitoring for copper and lead at station 601 required by the permit to be done on the same day as monitoring at station 001. This monitoring is to allow calculations for determining the removal efficiency of the pretreatment system. In light of USEPA's determination that Ohio EPA's approach of considering the effectiveness of the treatment system as a basis for establishing effluent limits is not supportable, I consider the monitoring violation to be moot and not a concern. Influent monitoring will likely be removed from the renewed permit.

In reviewing the monitoring results it was noteworthy that in May 2009, influent copper was 2,710 ug/l and lead was 5,230 ug/l. Unfortunately, without the corresponding effluent data as described above, it is not known how well the pretreatment system performed. I would appreciate your investigation of activities that might explain these very high influent values.

Pretreatment System Modifications

The activated carbon filtering system has been taken off-line and you indicated that it will not be used because fouling problems make them ineffective. Given that the activated carbon system is no longer to be used for removal of phenolics, I believe it is necessary for you to now formalize the hydrogen peroxide feed system that has been operated as a pilot project since early 2008. I ask that a Permit to Install (PTI) application be submitted for this treatment unit as soon as possible. Please let me know when you plan to submit an application.

Effluent Monitoring

I observed that a new time-proportional composite sampler is in the process of being installed. Mr. Noble stated that there is a problem with the progressing cavity roller mechanism that has kept the sampler from being used. Once this issue is resolved, composite sampling will occur by having the sampler activated by a pressure transducer installed on the (pumped) effluent discharge line. Once activated, the composite sampler will collect time-proportional samples. This will ensure that samples are only collected when there is an active discharge. Please let me know when this sampler is finally put into use.

Flow Verifications/Updates

It is my impression that reported total flows are more accurately weekly flows given that waste waters are accumulated during the week for treatment and discharge during the period of Thursday through Friday. I need to know if the reported die casting flows are also a weekly total or if indeed the reported flows occur each production day.

In addition to this clarification, there have been changes made to waste streams that impact the permit limits that I need you to provide a formal update for. In particular, the cooling tower blowdown that was listed as a source of dilution in the current and draft permit renewal has been re-routed to a sanitary drain. Also, waste water from the ATG S-Gear packing washer has been reduced or eliminated by the installation of a recycle system. Finally, you mentioned that you are close to bringing a glass bead parts washer into use on the remanufacture line to replace a dry ice-based system.

Please provide appropriate updates to your flow diagrams attached to this inspection so that I have an accurate record of your facility's operations. Any changes should also be reflected in your Indirect Discharge Permit renewal application. Please provide any necessary updates by September 7, 2009.

Pounds of Metal Poured

The amount of metal being poured is information that also directly affects your permit limits. It appears that the only way I can get this information is for you to send reports directly to me. Until another method can be identified, I ask that you send me the information required by Part I.A.11 of your permit via e-mail for the same periods and by the same due dates as your self-monitoring reports.

Please provide a written response to this letter by July 31st addressing the issues I have raised from my inspection. 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
Ryan Laake - Ohio EPA / Central Office / DSW

Ohio Environmental Protection Agency

PRETREATMENT INSPECTION REPORT

PERMIT NUMBER	FACILITY NUMBER	DATE CONDUCTED		
*1DP00009*GP*	*OHP000075*	*June 10, 2009*		
INSPECTION TYPE	**INSPECTOR**	**FACILITY TYPE**	**TIME IN**	**TIME OUT**
I	*S*	*2*	*0830*	1200

GENERAL INFORMATION

NAME AND LOCATION OF FACILITY	POTW RECEIVING DISCHARGE
Honda Transmission Manufacturing, Inc. ***6964 State Route 235 North*** ***Russells Point, OH 43348***	***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 descriptions)

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

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

Name and Signature of Inspector(s)	Agency / Office / Telephone	Date
Matt Walbridge	*Ohio EPA / Southwest District Office / (937) 285-6095*	7-15-09
Signature of Reviewer	*Ohio EPA / Southwest District Office / (937) 285-6034*	Date 7/15/09

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: ***Honda Transmission Manufacturing, Inc.*** Date of inspection:

Facility Number: ***OHP000075*** IDP Number: ***1DP00009*GP***

Facility Representative: ***Lee Sanders and Ken Campbell*** Inspector(s): ***Matt Walbridge***

COMPLIANCE

1. Date of last pretreatment inspection: ***June 26, 2008***

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:

   For February and March, influent monitoring was not done on the same day as effluent monitoring as required by the permit

4. Was the facility required to perform any actions as a result of the last inspection? Y /~~N~~
   Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: ***~1,200*** *(~1,000 in production)* 6. Shifts/Day: ***3***

7. Production Days/Year: ***279*** 8. Hours/shift: ***8***
   (Shutdown occurs during the first week in July and the week between Christmas and New Years.)

9. Any production changes since the last inspection? Y /~~N~~
   If yes, explain:

   Automatic transmission gear manufacturing (forging, heat treating machining and peening) are down ~25% from normal production levels.

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.

    Remanufacturing (reman) for aftermarket service includes parts washing with glass beads and washer fluid is in place but not in operation. The current system uses dry ice. They are working out the details before the glass bead washer system is put into use. This source will need to be accounted for in the CWF.

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

If yes, explain: ***Line 3 machining is not operating as of Jan-Feb. '09. The line will be re-built with new equipment.***

12. Any expansion or production increase expected within the next year? ~~Y~~ / N
If yes, explain:

They are still looking to switch to a zinc-free machining coolant plant-wide.
Operation of a glass-bead parts washer for re-manufactured parts. It is currently installed.

Plans for three new die casting machines are currently on hold because of the economic climate.

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. From the EQ tank wastewater is pumped to two ultra filtration systems. A third UF system from the previous pretreatment system is available as a back-up system.

Permeate from the UF units flow to a collection tank and then pumped through a flow meter prior to discharge to the lift station serving the facility. A hydrogen peroxide feed system at the final discharge tank was added in January 2008 and continues to be used.

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~~
The two 2,000-pound activated carbon filters intended for removal of phenolics are now off-line.
An odor control system (aspirated odor eater with fan) was installed for the tank farm building.

If yes, was a PTI obtained? ~~Y~~ / N

PTI Number: Date:

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

All of the wastewater is treated in a continuous mode. Continuous treatment occurs 16 hours from Thursday into Friday.

If batch, list the frequency and duration:

17. Who is responsible for operating the treatment system?
Jeff Noble (w/ Nalco), Mike Merillat (he's a floater)
Ken Campbell - is available as backup.
Mr. Noble continues to maintain the system in excellent condition.

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

18. How often is the treatment system checked?

Throughout each day of a 50-hour work week. When not attended by an operator, plant security guards check it using a security key system. The guards have guidance on what to look for and how to respond.

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

Tank 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. There is also an alarm for room temperature to ensure caustic doesn't freeze.

20. Is there an operations and maintenance manual? Y /~~N~~
Need to amend it for the hydrogen peroxide feed system.

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

UF tubes, spare and redundant pumps, discharge flow meter.

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, aluminum swarfe, dross, flash, scale from forging, knockouts from stamping, spent glass beads (from peening, not washing) and steel shot. The pretreatment EQ tank is cleaned yearly.

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, Wabash takes the metals and Ashland manages waste & recycling.

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 PROCESSES	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
1. *Die Casting**	*Regulated waste streams are not sampled prior to mixing with other waste streams*	*7,554*	*~4,000 (measured)*	*92,000 lbs /day*	*~120,000 lbs/day*
2. *Die Maintenance**					
3. *Cast Quench* (1/week)*					
Total Regulated Process Flow		7,554	~4,000 measured		
UNREGULATED PROCESSES					
1. *Parts Washing*	*Unregulated wastestreams are not sampled prior to mixing with other waste streams*	*28,392 (1)*	*Not measured*		
2. *Mop Station*					
3. *Forging*					
Total Unregulated Process Flow		28,392	Not measured		
DILUTE FLOW OPERATIONS					
1. *Non-Contact Cooling Water*	*Dilute wastestreams are not sampled prior to mixing with other waste streams*	*4,876*	*Not measured*		
~~2. *Cooling Tower Blowdown* (4)~~					
3. *Air Compressor Condensate*					
Total of Dilute Flows		4,876	Not measured		
Sanitary		*(2)*	*(2)*		
TOTAL FLOW	*Discharge from the Final Check Tank*	*40,822*	*~50,000 (3)*		

+ Although not a limit.

** Flows from these contributing sources are measured collectively.*

(1) These sources are treated by Ohio EPA as if they were regulated by Metal Finishing even though Honda has no core Metal Finishing operations. Final effluent limits also consider the reasonable performance of the pretreatment system and the concentration of pollutants in the influent. USEPA has determined this approach to be inappropriate.

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

(3) Based on most-recent self-monitoring report covering the period of January through June 2009. Reported flows are actually a weekly flow with treatment and discharge typically occurring only Thursday through Friday. It is unknown if the reported die casting flows are a weekly or daily values.

(4) This source was recently re-routed to a new sanitary lift station. It no longer is present in the monitored effluent.

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:

Except that sampling at outfall 001 is now actually the discharge from the final effluent tank.

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 magmeter

If measured, how often is the meter calibrated?

Calibration determined to not be necessary.

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:

MASI as of October 2007. They set up to sample from Thursday to Friday once per month.

32. Are appropriate sampling procedures followed?

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.)***	NA ~~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: ***MASI***

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? ~~Y~~ / N
If yes, identify organics:

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 the UF system.

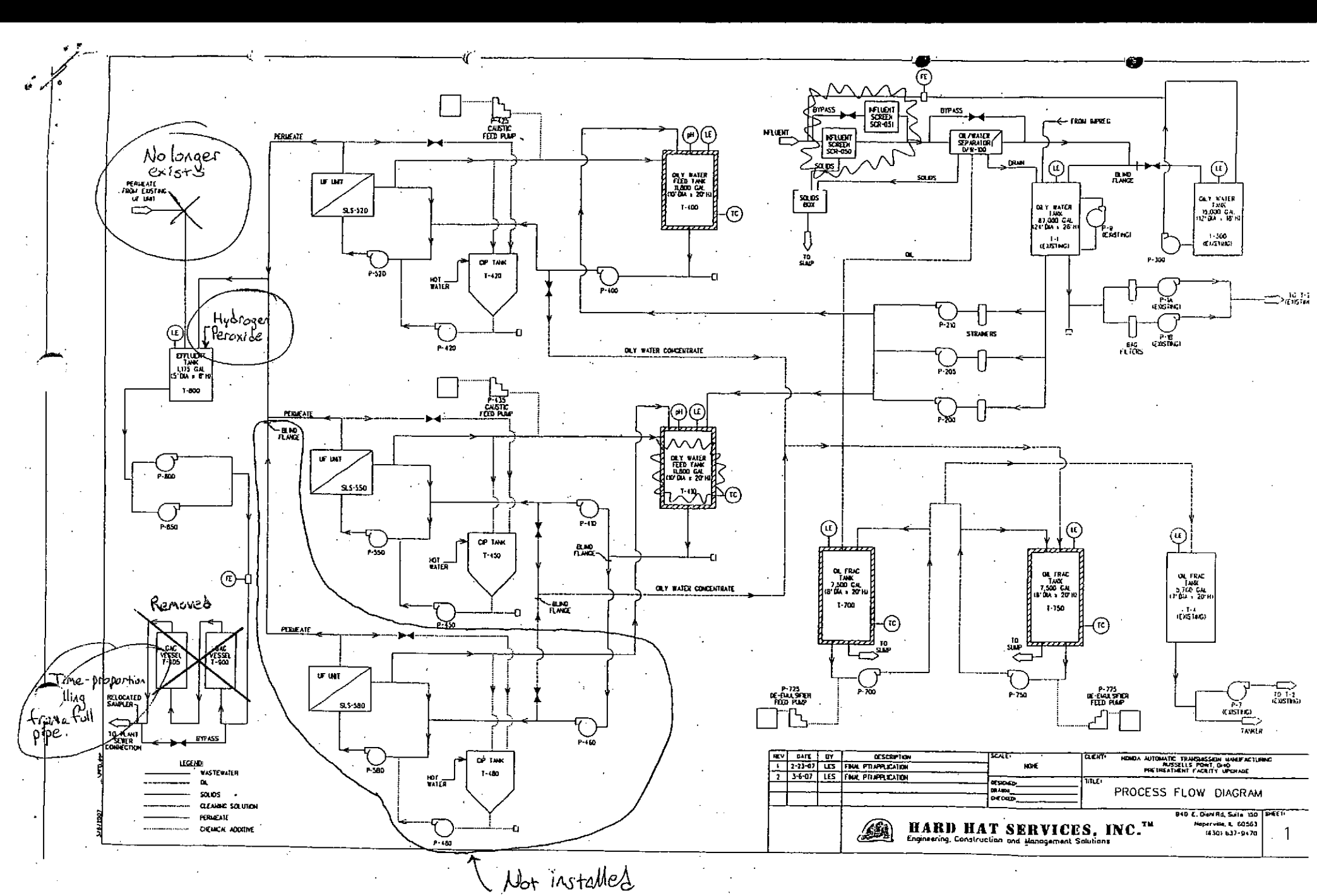
They maintain a storm water pollution prevention plan.

GENERAL OBSERVATIONS

1. ***Areas of the plant were preparing for shut down and tanks were being drained.***
2. ***Most recent flows are actually a weekly flow as treatment and discharge typically occurs only Thursday through Friday***
3. ***Activated carbon is no longer being used***
4. ***Hydrogen peroxide feed system installed on a pilot basis since January-February '08. Seems like it's time for a permit to install.***
5. ***Line 3 down since the beginning of 2009. It is in the process of being rebuilt with new equipment.***
6. ***Still working to go to a zinc-free machining coolant plant-wide.***

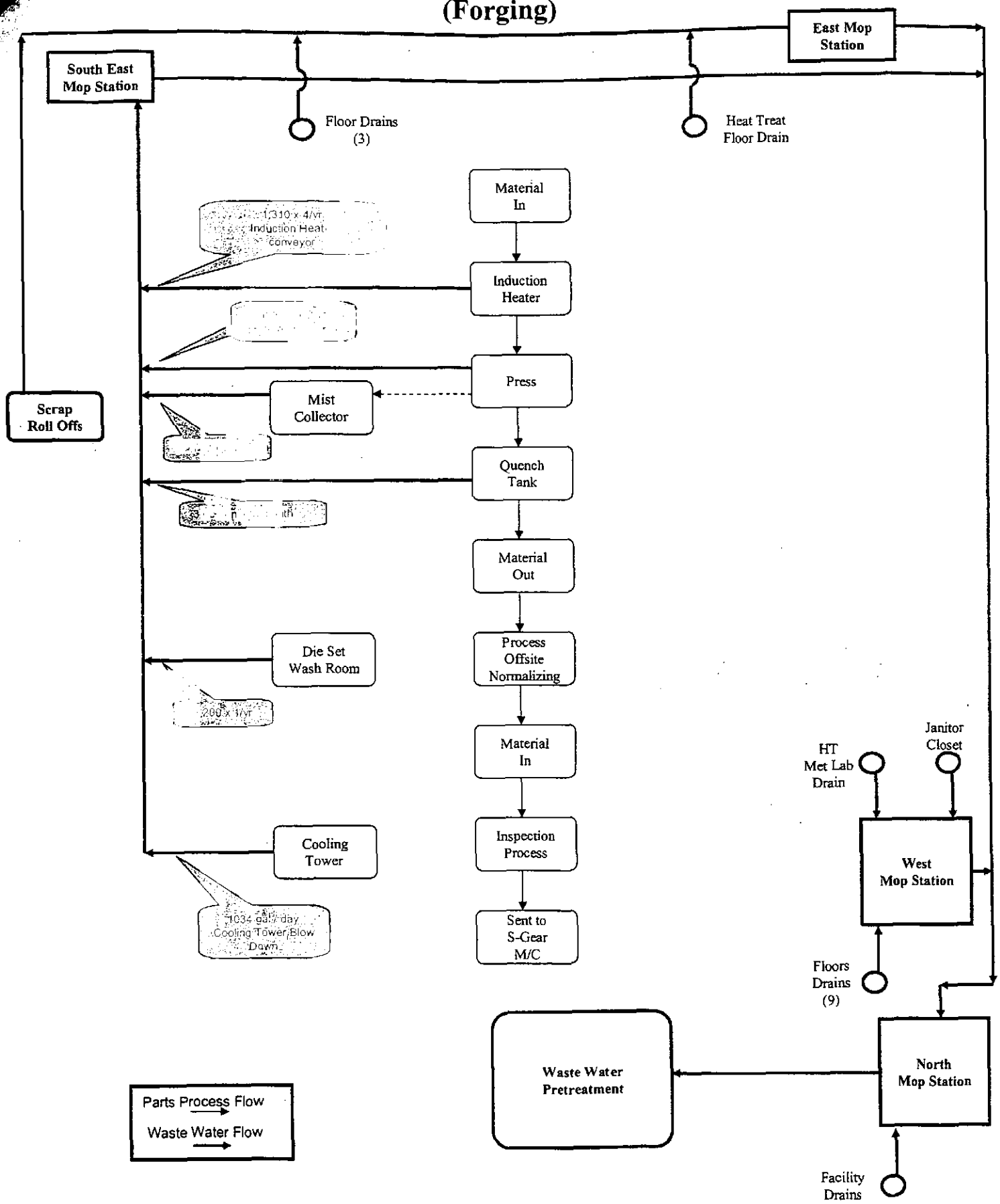
REQUIRED FOLLOW-UP ACTIONS

Please see the inspection letter.


No longer exists
PERMEATE FROM EXISTING UF UNIT
Hydrogen Peroxide
Removed
Time-proportioning from a full pipe.
Not installed
P-425 CAUSTIC FEED PUMP
UF UNIT SLS-520
OIL WATER FEED TANK 11,000 GAL (10' DIA x 20' H) T-400
CIP TANK T-420
HOT WATER
P-520
P-420
P-400
EFFLUENT TANK 1,175 GAL (5' DIA x 8' H) T-800
P-800
P-850
P-435 CAUSTIC FEED PUMP
UF UNIT SLS-550
OIL WATER FEED TANK 11,000 GAL (10' DIA x 20' H) T-410
CIP TANK T-430
P-550
P-450
P-410
BLIND FLANGE
UF UNIT SLS-580
CIP TANK T-480
P-580
P-480
P-460
GAC VESSEL T-925
GAC VESSEL T-950
RELOCATED SAMPLER
TO PLANT SEWER CONNECTION
BYPASS
PERMEATE
OIL WATER CONCENTRATE
INFLUENT SCREEN SCR-051
INFLUENT SCREEN SCR-050
OIL/WATER SEPARATOR DVW-100
INFLUENT
BYPASS
FROM BYPASS
SOLIDS
DRAIN
SOLIDS BOX
TO SUMP
OIL WATER TANK 87,000 GAL (24' DIA x 28' H) T-1 (EXISTING)
OIL WATER TANK 15,000 GAL (12' DIA x 18' H) T-300 (EXISTING)
P-9 (EXISTING)
P-300
OIL
P-210
STRAINERS
P-205
P-200
P-1A (EXISTING)
P-1B (EXISTING)
BAG FILTERS
TO T-3 (EXISTING)
OIL FRAC TANK 7,500 GAL (8' DIA x 20' H) T-700
OIL FRAC TANK 7,500 GAL (8' DIA x 20' H) T-750
OIL FRAC TANK 5,760 GAL (7' DIA x 20' H) T-1 (EXISTING)
P-700
P-750
P-725 DE-EMULSIFIER FEED PUMP
P-775 DE-EMULSIFIER FEED PUMP
P-7 (EXISTING)
TO T-2 (EXISTING)
TANKER
LEGEND:
WASTEWATER
OIL
SOLIDS
CLEANING SOLUTION
PERMEATE
CHEMICAL ADDITIVE
REV | DATE | BY | DESCRIPTION
1 | 2-23-07 | LES | FINAL PTI APPLICATION
2 | 3-6-07 | LES | FINAL PTI APPLICATION
SCALE: NONE
DESIGNED
DRAWN
CHECKED
CLIENT: HONDA AUTOMATIC TRANSMISSION MANUFACTURING RUSSELLS POINT, OHIO PRETREATMENT FACILITY UPGRADE
TITLE: PROCESS FLOW DIAGRAM
HARD HAT SERVICES, INC.™
Engineering, Construction and Management Solutions
840 E. Diehl Rd, Suite 150 Naperville, IL 60563 (630) 637-9470
SHEET: 1

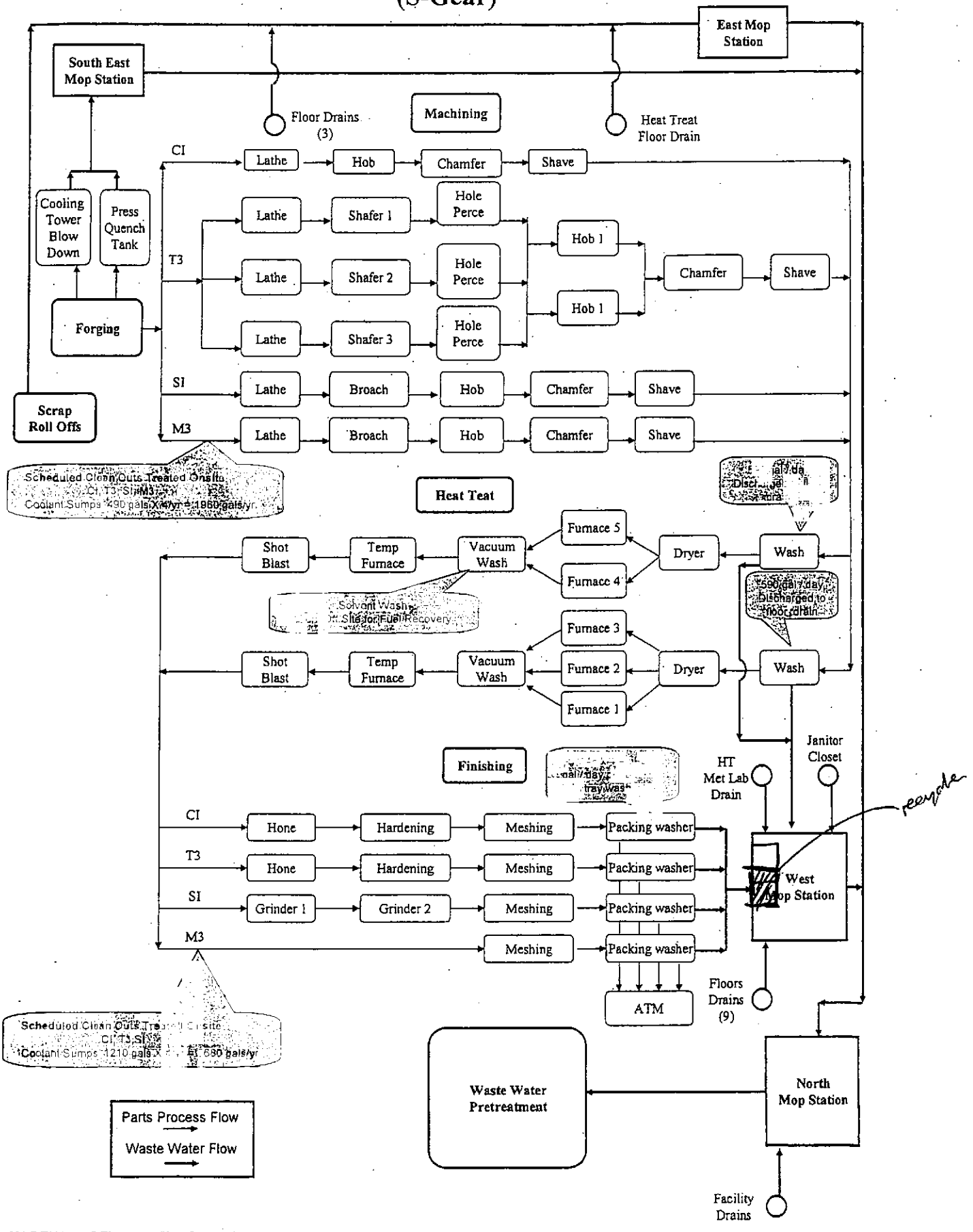
ATG Flows

(Forging)



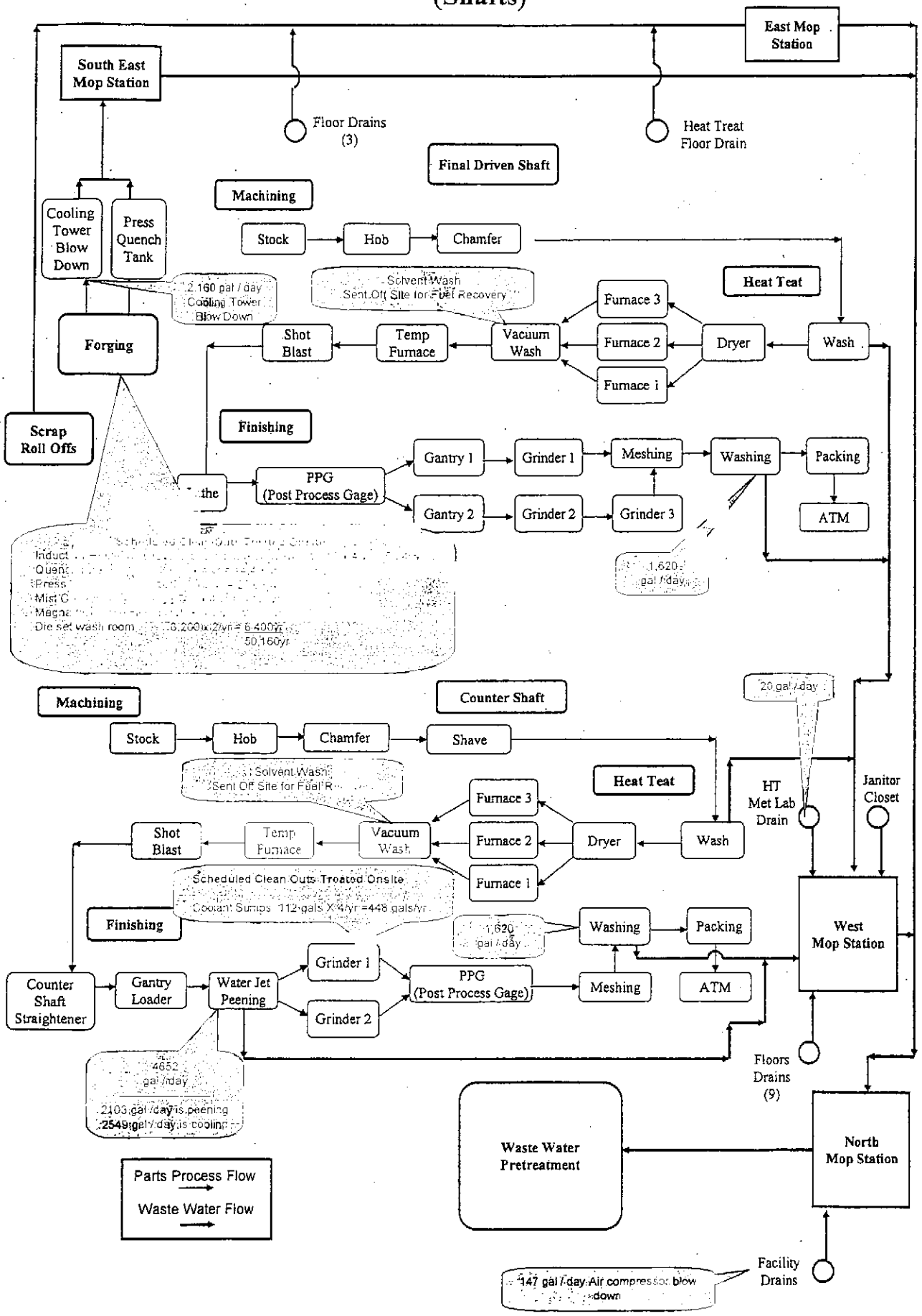
ATG Flows

(S-Gear)



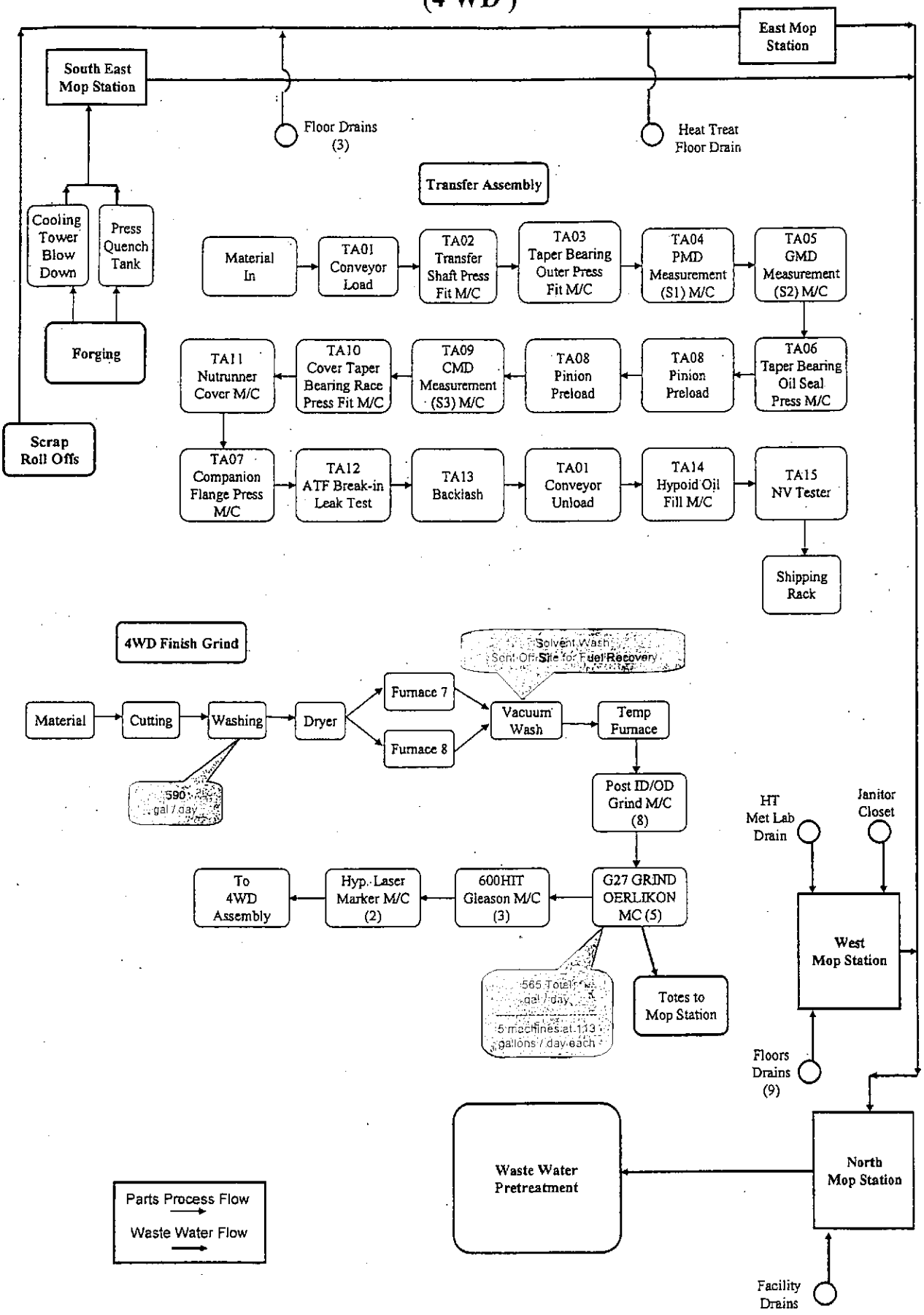
ATG Flows

(Shafts)



ATG Flows

(4 WD)



ATG Flows

(4 WD)