



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: FINAL PERMIT TO INSTALL
SHELBY COUNTY
Application No: 05-13485
Fac ID: 0575000174**

CERTIFIED MAIL

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

DATE: 11/18/2004

Honda of America Mfg Inc
Paul Huwer
12500 MERANDA RD
ANNA, OH 45302-9699

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/18/2004
Effective Date: 11/18/2004**

FINAL PERMIT TO INSTALL 05-13485

Application Number: 05-13485
Facility ID: 0575000174
Permit Fee: **\$5250**
Name of Facility: Honda of America Mfg Inc
Person to Contact: Paul Huwer
Address: 12500 MERANDA RD
ANNA, OH 45302-9699

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12500 Meranda Rd
Anna, Ohio**

Description of proposed emissions unit(s):
Line No. 4 spincast operations, modifying and adding equipment to allow for the production increases of cylinder sleeves.

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 quarterly, i.e., 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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 this Permit To Install.

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 of 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, the State, and citizens 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 To Install 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.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 quarterly, i.e., 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. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install 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)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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., 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>
PE	11.92
PM-10	0.04

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P078 - Spincast machine no. 1, preheat torches with hooding, with baghouse control (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.001 lb/hr and 0.005 tons per year, from emissions unit P078 only</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>Emissions from the use of natural gas combustion shall not exceed the following for this emissions unit: Nitrogen oxides (NOx) - 0.28 lb/hr; Carbon monoxide(CO) - 0.23 lb/hr; Volatile Organic compound (VOC) - 0.02 lb/hr; Sulfur dioxide (SO2) - 0.002 lb/hr</p> <p>Compliance with this rule includes compliance with OAC rule 3745-17-07(B).</p> <p>See Sections A.I.2.a, A.I.2.b and A.II.1 below.</p>

OAC rule 3745-17-07(A)(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).
OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. This emission unit shall use only detergent based or earthen based mold release agents.
- 2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the type of mold release agent employed (i.e., either detergent based or earthen based) in this emissions unit.
- 2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse 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 weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time in which this emissions unit was in operation and the pressure drop across the baghouse did not comply with the allowable range; and
 - b. all periods of time during which any non-detergent based or non-earthen based mold release agent was employed in this emissions unit.

These reports are due by the dates as specified in Part I - General Terms and Condition A.1. of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);

AV = the air variability factor (105%);

BEF = baghouse efficiency (0.004 grain of PE/dscf);

TI = time (60 minutes/hr); and

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

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.

2. Emission Limitation:

10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:

0.001 lb of fugitive PE/hr, for emissions unit P078 only

0.005 ton of fugitive PE/yr, for emissions unit P078 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

Process fugitive emissions

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(SF)(1-CAP) = 0.001 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE emission factor (0.33 lb of PE/ton of metal)*;

SF = safety factor of 2; and

CAP = control device capture efficiency (99.9%)

and

Natural gas combustion

$$(\text{BBTU})(1/\text{BCONV})(\text{PMEF})(1-\text{CAP}) = 5.2 \text{ EE-6 lb of PE/hr}$$

where:

BBTU = burner Btu/hr (2,760,000 Btu/hr);

BCONV = Btu to scf conversion factor (1,000 Btu/scf);

PMEF = PE factor (1.9 lb of PE/mmscf)**; and

CAP = control device capture efficiency (99.9%).

* Reference from the Air Emissions from Permanent Mold Castings of Ductile Iron Pipe, Marvin D McKinley, Professor of chemical Engineering, University of Alabama, September 1994).

** AP-42, Table 1.4-2, revised 7/98.

The annual fugitive PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 0.001 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

4. Emission Limitations:

0.28 lb NO_x/hr

0.23 lb CO/hr

0.02 lb VOC/hr

0.002 lb SO₂/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (2,760 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

5. Visible Emission Limitations:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.

Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The permittee shall conduct, or have conducted, emission testing for the baghouse to demonstrate compliance with the allowable PE limitations.
 - a. The emission testing shall be conducted within 6 months of the modification 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

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 emissions unit's P078, P079, P080, P081, P082, P083, P089, P090 and P091 are operating 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.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P078 - Spincast machine no. 1, preheat torches with hooding, with all emissions venting to a baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P079 - Spincast machine no. 2, preheat torches with hooding, with all emissions vented to a baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091. Fugitive PE shall not exceed 0.001 lb/hr and 0.005 tons per year, from emissions unit P079 only Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack. Emissions from the use of natural gas combustion shall not exceed the following for this emissions unit: Nitrogen oxides (NOx) - 0.28 lb/hr; Carbon monoxide(CO) - 0.23 lb/hr; Volatile Organic compound (VOC) - 0.02 lb/hr; Sulfur dioxide (SO2) - 0.002 lb/hr Compliance with this rule includes compliance with OAC 3745-17-07(B). See Sections A.I.2.a, A.I.2.b and A.II.1 below.

OAC rule 3745-17-07(A)(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).
OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE, NO_x, CO, VOC, and SO₂ emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. This emission unit shall use only detergent based or earthen based mold release agents.
- 2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the type of mold release agent employed (i.e., either detergent based or earthen based) in this emissions unit.

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which any non-detergent based or non-earthen based mold release agent was employed in this emissions unit. This report is due by the dates as specified in Part I - General Terms and Condition A.1. of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);

AV = the air variability factor (105%);

BEF = baghouse efficiency (0.004 grain of PE/dscf);

TI = time (60 minutes/hr); and

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

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.

2. Emission Limitation:

10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:

0.001 lb of fugitive PE/hr, for emissions unit P079 only

0.005 ton of fugitive PE/yr, for emissions unit P079 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

Process fugitive emissions

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(SF)(1-CAP) = 0.001 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE emission factor (0.33 lb of PE/ton of metal)*;

SF = safety factor of 2; and

CAP = control device capture efficiency (99.9%)

and

Natural gas combustion

$$(BBTU)(1/BCONV)(PMEF)(1-CAP) = 5.2 \text{ EE-6 lb of PE/hr}$$

where:

BBTU = burner Btu/hr (2,760,000 Btu/hr);
BCONV = Btu to scf conversion factor (1,000 Btu/scf);
PMEF = PE factor (1.9 lb of PE/mmscf)**; and
CAP = control device capture efficiency (99.9%).

* Reference from the Air Emissions from Permanent Mold Castings of Ductile Iron Pipe, Marvin D McKinley, Professor of chemical Engineering, University of Alabama, September 1994).

** AP-42, Tables 1.4-2, revised 7/98.

The annual fugitive PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 0.001 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

4. Emission Limitations:

0.28 lb NO_x/hr
0.23 lb CO/hr
0.02 lb VOC/hr
0.002 lb SO₂/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (2,760 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

5. Visible Emission Limitations:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

Honda of America Mfg Inc

PTI Application: 05-13485

Issued: 11/18/2004

Facility ID: 0575000174

Emissions Unit ID: P079

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P079 - Spincast machine no. 2, preheat torches with hooding, with all emissions vented to a baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P080 - Shotblast machine and transfer equipment, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091. Fugitive PE shall not exceed 0.05 lb/hr, from emissions unit P080 only Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack. See Sections A.I.2.a and A.II.1 below. Compliance with this rule includes compliance with OAC rules 3745-31-05(C) and 3745-17-07(B).
	OAC rule 3745-31-05(C)	Fugitive PE shall not exceed 0.12 ton per rolling, 12-month summation for emissions unit P080 only
	OAC rule 3745-17-07(A)(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).

OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. The maximum annual iron throughput shall not exceed 15,432 tons, based on a rolling, 12-month summation.
- 2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the iron throughput for each month, in tons; and
 - b. the rolling, 12-month summation of iron throughput, in tons, (the summation of the iron throughput for the current month, plus the total iron throughput for the previous 11 calendar months).

2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the all exceedances of the rolling, 12-month summation of the iron throughput limitation of 15,432 tons. These reports are due by the dates as specified in Part I - General Terms and Condition A.1. of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);
AV = the air variability factor (105%);
BEF = baghouse efficiency (0.004 grain of PE/dscf);
TI = time (60 minutes/hr); and
CONV = conversion factor (1 lb/7,000 grains).

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.

2. Emission Limitation:

10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:

Fugitive PE shall not exceed 0.05 lb/hr, from emissions unit P080 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP) = 0.05 \text{ lb PE/hr}$$

where:

PMER = PE rate (15.5 lb of PE/ton of metal)*;
MMR = maximum metal (iron throughput) rate (3,086 kg/hr); and
CAP = control device capture efficiency (99.9%).

* Reference obtained from American Foundry Society, Modern Casting, dated January 1972.

4. Emission Limitations:

Fugitive PE shall not exceed 0.12 ton per rolling, 12-month summation for emissions unit P080 only

Applicable Compliance Method:

The annual emissions limitation was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP)(1 \text{ lb}/2000 \text{ tons}) = 0.12 \text{ tons}$$

where:

PMER = PE rate (15.5 lb of PE/ton of metal)*;

MMR = maximum metal (iron throughput) rate of 14,000,000 kg/yr (15,432 tons); and

CAP = control device capture efficiency (99.9%).

5. Visible Emission Limitations:

Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.

Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P080 - Shotblast machine and transfer equipment, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P081 - Tube cutting machine no. 1, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P081 only</p> <p>Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P081 only.</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>Compliance with this rule includes compliance with OAC rule 3745-17-07(B).</p> <p>See Sections A.I.2.a, A.I.2.b and A.II.1 below.</p>
	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE

OAC rule 3745-17-07(B)(1)	limitation established pursuant to OAC rule 3745-31-05(A)(3). Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);

AV = the air variability factor (105%);

BEF = baghouse efficiency (0.004 grain of PE/dscf);

TI = time (60 minutes/hr); and

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

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.

2. Emission Limitation:
10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:
Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P081 only
PM-10 shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P081 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP) = 0.03 \text{ lb PE/hr or } 0.003 \text{ lb PM-10/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE or PM-10 emission factor, as appropriate, (17 lb of PE/ton of metal and 1.7 lb PM-10/ton of metal)*;

CAP = control device capture efficiency (99.9%)

* Emission factor reference obtained from U.S. EPA FIRE database (SCC 3-04-003-40)

The annual fugitive PE PM-10 emission limitations represents the emissions unit's potential to emit and were established by multiplying the hourly PE or PM-10 limitations of 0.03 or 0.003 lbs, as appropriate, by the maximum operating hours per year, 8,760, and dividing the result by 2,000 lbs per ton.

4. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

Honda of America Mfg Inc

PTI Application: 05-13485

Issued: 11/18/2004

Facility ID: 0575000174

Emissions Unit ID: P081

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P081 - Tube cutting machine no. 1, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P082 - Tube cutting machine no. 2, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P082 only</p> <p>Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P082 only.</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>Compliance with this rule includes compliance with OAC rule 3745-17-07(B).</p> <p>See Sections A.I.2.a, A.I.2.b and A.II.1 below.</p>
	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE

OAC rule 3745-17-07(B)(1)	limitation established pursuant to OAC rule 3745-31-05(A)(3). Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);
AV = the air variability factor (105%);
BEF = baghouse efficiency (0.004 grain of PE/dscf);
TI = time (60 minutes/hr); and
CONV = conversion factor (1 lb/7,000 grains).

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.

2. Emission Limitation:
10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:
Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P082 only
PM-10 shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P082 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP) = 0.03 \text{ lb PE/hr or } 0.003 \text{ lb PM-10/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE or PM-10 emission factor, as appropriate, (17 lb of PE/ton of metal and 1.7 lb PM-10/ton of metal)*;

CAP = control device capture efficiency (99.9%)

* Emission factor reference obtained from U.S. EPA FIRE database (SCC 3-04-003-40)

The annual fugitive PE PM-10 emission limitations represents the emissions unit's potential to emit and were established by multiplying the hourly PE or PM-10 limitations of 0.03 or 0.003 lbs, as appropriate, by the maximum operating hours per year, 8,760, and dividing the result by 2,000 lbs per ton.

4. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

Honda of America Mfg Inc

PTI Application: 05-13485

Issued: 11/18/2004

Facility ID: 0575000174

Emissions Unit ID: P082

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P082 - Tube cutting machine no. 2, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350 issued 6/19/01)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P083 - Autopour equipment includes emissions from transfer, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350)	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091. Fugitive PE shall not exceed 0.22 lb/hr, from emissions unit P083 only Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack. See Sections A.I.2.a and A.II.1 below.
	OAC rule 3745-31-05(C)	Fugitive PE shall not exceed 0.51 ton per rolling, 12-month summation for emissions unit P080 only
	OAC rule 3745-17-07(A)(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).

OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).
40 CFR Part 63, Subpart EEEEE	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart EEEEE (National Emission Standards for Hazardous Air Pollutants: Iron and Steel Foundries) as specified in the Title V operating permit issued 06/24/04.

2. Additional Terms and Conditions

2.a The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

II. Operational Restrictions

1. The maximum annual iron throughput shall not exceed 15,432 tons, based on a rolling, 12-month summation.
2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the iron throughput for each month, in tons; and
 - b. the rolling, 12-month summation of iron throughput, in tons, (the summation of the iron throughput for the current month, plus the total iron throughput for the previous 11 calendar months).
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the all exceedances of the rolling, 12-month summation of the iron throughput limitation of 15,432 tons.
These reports are due by the dates as specified in Part I - General Terms and Condition A.1. of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);

AV = the air variability factor (105%);

BEF = baghouse efficiency (0.004 grain of PE/dscf);

TI = time (60 minutes/hr); and

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

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.

2. Emission Limitation:

10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:

Fugitive PE shall not exceed 0.22 lb/hr, from emissions unit P083 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by summing emissions from pouring and holding as calculated by the following methodologies:

emissions from pouring:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP) = 0.07 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate of 3,086 kg/hr, 14,000,000 kg/yr;

PMER = the PE rate (2.06 lbs of PE/ton of metal)*; and

CAP = control device capture efficiency (99%)**.

* Emission factor reference provided by Honda.

** 99% of the PE from this source are controlled by the baghouse, 1% escapes as fugitive PE.

emissions from holding:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP) = 0.15 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate of 3,086 kg/hr;

PMER = the PE rate (0.86 lb of PE/ton of metal)*; and

CAP = control device capture efficiency (95%)**.

* Emission factor reference obtained from U.S. EPA Fire database.

** 95% of the PE from this source are controlled by the baghouse, 5% escapes as fugitive PE.

4. Emission Limitations:

Fugitive PE shall not exceed 0.51 ton per rolling, 12-month summation for emissions unit P083 only

Applicable Compliance Method:

The annual emissions limitation was determined by summing emissions from pouring and holding as calculated by the following methodologies:

emissions from pouring:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP)(1 \text{ ton}/2000 \text{ lbs}) = 0.16 \text{ tons PE/yr}$$

where:

MMR = maximum metal (iron throughput) rate of 14,000,000 kg/yr;

PMER = the PE rate (2.06 lbs of PE/ton of metal)*; and

CAP = control device capture efficiency (99%)**.

* Emission factor reference provided by Honda.

** 99% of the PE from this source are controlled by the baghouse, 1% escapes as fugitive PE.

emissions from holding:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP)(1 \text{ ton}/2000 \text{ lbs}) = 0.35 \text{ tons PE/yr}$$

where:

MMR = maximum metal (iron throughput) rate of 14,000,000 kg/hr;

PMER = the PE rate (0.86 lb of PE/ton of metal)*; and

CAP = control device capture efficiency (95%)**.

* Emission factor reference obtained from U.S. EPA Fire database.

** 95% of the PE from this source are controlled by the baghouse, 5% escapes as fugitive PE.

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PTI Application: 05-13485
Issued: 11/18/2004

Facility ID: 0575000174
Emissions Unit ID: P083

5. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P083 - Autopour equipment includes emissions from transfer, with PE vented to baghouse system (terms in this permit supersede those of PTI 05-11350)		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P089 - tube cutting machine no. 3, with PE vented to baghouse system	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P089 only</p> <p>Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P089 only.</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>Compliance with this rule includes compliance with OAC rule 3745-17-07(B).</p> <p>See Sections A.I.2.a, A.I.2.b and A.II.1 below.</p>
	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE

OAC rule 3745-17-07(B)(1)	limitation established pursuant to OAC rule 3745-31-05(A)(3). Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);
AV = the air variability factor (105%);
BEF = baghouse efficiency (0.004 grain of PE/dscf);
TI = time (60 minutes/hr); and
CONV = conversion factor (1 lb/7,000 grains).

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.

2. Emission Limitation:
10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:
Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P089 only
PM-10 shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P089 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP) = 0.03 \text{ lb PE/hr or } 0.003 \text{ lb PM-10/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE or PM-10 emission factor, as appropriate, (17 lb of PE/ton of metal and 1.7 lb PM-10/ton of metal)*;

CAP = control device capture efficiency (99.9%)

* Emission factor reference obtained from U.S. EPA FIRE database (SCC 3-04-003-40)

The annual fugitive PE PM-10 emission limitations represents the emissions unit's potential to emit and were established by multiplying the hourly PE or PM-10 limitations of 0.03 or 0.003 lbs, as appropriate, by the maximum operating hours per year, 8,760, and dividing the result by 2,000 lbs per ton.

4. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

5. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P089 - tube cutting machine no. 3, with PE vented to baghouse system		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P090 - tube cutting machine no. 4, with PE vented to baghouse system	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P090 only</p> <p>Particulate matter less than or equal to an aerodynamic diameter of 10 micrometers (PM-10) shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P090 only.</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>Compliance with this rule includes compliance with OAC rule 3745-17-07(B).</p> <p>See Sections A.I.2.a, A.I.2.b and A.II.1 below.</p>
	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE

OAC rule 3745-17-07(B)(1)	limitation established pursuant to OAC rule 3745-31-05(A)(3). Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).

2. Additional Terms and Conditions

- 2.a** The hourly and annual emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control PE dust by venting to a baghouse.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);
AV = the air variability factor (105%);
BEF = baghouse efficiency (0.004 grain of PE/dscf);
TI = time (60 minutes/hr); and
CONV = conversion factor (1 lb/7,000 grains).

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.

2. Emission Limitation:
10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:
Fugitive PE shall not exceed 0.03 lb/hr and 0.13 tons per year, from emissions unit P090 only
PM-10 shall not exceed 0.003 pounds per hour nor 0.01 tons per year. from emissions unit P090 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(MMR)(2.2046 \text{ lbs/kg})(PMER)(1 \text{ ton}/2000 \text{ lbs})(1-CAP) = 0.03 \text{ lb PE/hr or } 0.003 \text{ lb PM-10/hr}$$

where:

MMR = maximum metal (iron throughput) rate (1,543 kg/hr);

PMER = PE or PM-10 emission factor, as appropriate, (17 lb of PE/ton of metal and 1.7 lb PM-10/ton of metal)*;

CAP = control device capture efficiency (99.9%)

* Emission factor reference obtained from U.S. EPA FIRE database (SCC 3-04-003-40)

The annual fugitive PE PM-10 emission limitations represents the emissions unit's potential to emit and were established by multiplying the hourly PE or PM-10 limitations of 0.03 or 0.003 lbs, as appropriate, by the maximum operating hours per year, 8,760, and dividing the result by 2,000 lbs per ton.

4. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

5. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P090 - tube cutting machine no. 4, with PE vented to baghouse system		

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P091 - Autopour no. 2 for line no. 4 includes emissions from transfer, with PE vented to baghouse system	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 2.34 pounds per hour, 0.004 grains per dry standard cubic foot, and 10.25 tons per year from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091.</p> <p>Fugitive PE shall not exceed 0.22 lb/hr, from emissions unit P091 only</p> <p>Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.</p> <p>See Sections A.I.2.a and A.II.1 below.</p> <p>Compliance with this rule includes compliance with OAC rules 3745-31-05(C) and 3745-17-07(B).</p>
	OAC rule 3745-31-05(C)	Fugitive PE shall not exceed 0.51 ton per rolling, 12-month summation for emissions unit P091 only
	OAC rule 3745-17-07(A)(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).

OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.
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).
40 CFR Part 63, Subpart EEEEE	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart EEEEE (National Emission Standards for Hazardous Air Pollutants: Iron and Steel Foundries) as specified in the Title V operating permit issued 06/24/04.

2. Additional Terms and Conditions

2.a The hourly emissions limitations specified above represent the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

II. Operational Restrictions

1. The maximum annual iron throughput shall not exceed 15,432 tons, based on a rolling, 12-month summation.
2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water 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 monitoring, record keeping, and reporting requirements for the baghouse pressure drop restriction are identified in Part III-Terms and Conditions for emissions unit P078. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary for this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the iron throughput for each month, in tons; and
 - b. the rolling, 12-month summation of iron throughput, in tons, (the summation of the iron throughput for the current month, plus the total iron throughput for the previous 11 calendar months).
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from the stack and for any visible fugitive PE from the egress points (i.e., building windows, doors, roof monitors, etc.) 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

If the weekly checks show visible emissions that are representative of normal operation for 12 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly. If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to weekly until such time there are 12 consecutive operating weeks of normal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the all exceedances of the rolling, 12-month summation of the iron throughput limitation of 15,432 tons.
These reports are due by the dates as specified in Part I - General Terms and Condition A.1. of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE were observed from the stack serving this emissions unit and (b) identify all days during which any visible fugitive PE were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive PE. These reports shall be submitted to the Ohio EPA, Southwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

Compliance with the emission limitations specified in Part III - A.I.1 shall be determined in accordance with the following methods:

1. Emission Limitation:
2.34 lb PE/hr and 0.004 gr/dscf, from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090 and P091

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by the following methodology:

$$(BFR)(AV)(BEF)(TI)(CONV) = 2.34 \text{ lbs of PE/hr}$$

where:

BFR = baghouse flow rate (65,000 acfm);

AV = the air variability factor (105%);

BEF = baghouse efficiency (0.004 grain of PE/dscf);

TI = time (60 minutes/hr); and

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

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.

2. Emission Limitation:

10.25 tons of PE/yr from the ferrous casting line #4 baghouse stack, serving emissions units P078, P079, P080, P081, P082, P083, P089, P090, and P091

Applicable Compliance Method:

The annual PE limitation represents the emissions unit's potential to emit and was established by multiplying the hourly PE limitation of 2.34 lbs by the maximum operating hours per year, 8,760, and dividing the result by 2000 lbs per ton.

3. Emission Limitation:

Fugitive PE shall not exceed 0.22 lb/hr, from emissions unit P091 only

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit and was established by summing emissions from pouring and holding as calculated by the following methodologies:

emissions from pouring:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP) = 0.07 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate of 3,086 kg/hr, 14,000,000 kg/yr;

PMER = the PE rate (2.06 lbs of PE/ton of metal)*; and

CAP = control device capture efficiency (99%)**.

* Emission factor reference provided by Honda.

** 99% of the PE from this source are controlled by the baghouse, 1% escapes as fugitive PE.
emissions from holding:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP) = 0.15 \text{ lb of PE/hr}$$

where:

MMR = maximum metal (iron throughput) rate of 3,086 kg/hr;
PMER = the PE rate (0.86 lb of PE/ton of metal)*; and
CAP = control device capture efficiency (95%)**.

* Emission factor reference obtained from U.S. EPA Fire database.

** 95% of the PE from this source are controlled by the baghouse, 5% escapes as fugitive PE.

4. Emission Limitations:

Fugitive PE shall not exceed 0.51 ton per rolling, 12-month summation for emissions unit P091 only

Applicable Compliance Method:

The annual emissions limitation was determined by summing emissions from pouring and holding as calculated by the following methodologies:

emissions from pouring:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP)(1 \text{ ton}/2000 \text{ lbs}) = 0.16 \text{ ton PE/yr}$$

where:

MMR = maximum metal (iron throughput) rate of 14,000,000 kg/yr;
PMER = the PE rate (2.06 lbs of PE/ton of metal)*; and
CAP = control device capture efficiency (99%)**.

* Emission factor reference provided by Honda.

** 99% of the PE from this source are controlled by the baghouse, 1% escapes as fugitive PE.

emissions from holding:

$$(MMR)(2.2046 \text{ lbs/kg})(1 \text{ ton}/2000 \text{ lbs})(PMER)(1-CAP)(1 \text{ ton}/2000 \text{ lbs}) = 0.35 \text{ ton PE/yr}$$

where:

MMR = maximum metal (iron throughput) rate of 14,000,000 kg/hr;
PMER = the PE rate (0.86 lb of PE/ton of metal)*; and
CAP = control device capture efficiency (95%)**.

* Emission factor reference obtained from U.S. EPA Fire database.

** 95% of the PE from this source are controlled by the baghouse, 5% escapes as fugitive PE.

Honda of America Mfg Inc
PTI Application: 05-13485
Issued: 11/18/2004

Facility ID: 0575000174
Emissions Unit ID: P091

5. Visible Emission Limitations:
Visible PE shall not exceed 0% opacity, as a 6-minute average, from any stack.
Visible PE shall not exceed 20% opacity, as a 3-minute average, from any fugitive dust emissions point.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

6. The testing requirements for this emissions unit are contained in Part III - Terms and Conditions for emissions unit P078.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P091 - Autopour no. 2 for line no. 4 includes emissions from transfer, with PE vented to baghouse system		

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