

February 21, 2003

Honda of America Mfg., Inc.
19900 State Route 739
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Iron and Steel Foundries NESHAP Docket
EPA Docket Center (Air Docket)

U.S. EPA West (MD-6102T)
Room B-108
1200 Penn Avenue, NW
Washington, DC 20004

Electronic Submittal

Attention: Docket ID No. OAR-2002-00334

To Whom It May Concern:

Honda of America Mfg., Inc. (“Honda”) is a manufacturer of automobiles, motorcycles, All Terrain Vehicles (ATVs), and engines. Honda has a manufacturing operation in central Ohio which will likely be impacted by the National Emission Standards for Hazardous Air Pollutants for Iron & Steel Foundries (“Iron and Steel Foundry MACT”) proposed in the Federal Register at 67 Fed. Reg. 78273 (December 23, 2002). Honda appreciates this opportunity to comment on the proposed rule.

Honda operates an engine manufacturing facility in central Ohio, the Anna Engine Plant (“AEP”). Operations at AEP include a gray iron foundry, aluminum die-casting and engine assembly.

Within the metal casting department¹, AEP operates several casting lines that use permanent molds to manufacture parts. The first system is a centrifugal casting operation that uses a permanent mold with an inert die release agent to produce iron engine cylinder sleeves that are inserted into aluminum engine blocks. The inert die release agent layer of the mold contains a small amount of surfactants used for mold release. The iron cylinder sleeves produced by the centrifugal casting operations replace sleeves that were once produced by a green sand casting operation. The second permanent mold operation employs a cooper mold to produce ductile iron parts. The cooper mold is coated with a carbonized soot layer by using an acetylene torch under fuel rich conditions. The purpose of this layer is to provide protection from the casting sticking to the mold. Both of these operations may generate small amounts of VOC.

In the proposed rule, EPA defines the proposed emission limitation for all new pouring, cooling and shakeout lines at a new metal casting department as a 98% reduction, by weight, in VOC emissions or an outlet concentration of no more than 20 ppmv of VOC (as propane).² As written, Honda believes that this requirement would compel centrifugal and permanent mold casting operations within a new metal casting department to control VOCs to 98 percent by weight or to a level that does not exceed 20 ppmv VOC (as propane). In the preamble to the proposed rule, EPA recognizes that organic emissions from pouring, cooling and shakeout lines result from the incomplete combustion of organic chemicals within chemically bonded molds and cores and from sea coal and other organic constituents of green sand.³ EPA also states that “[a]lthough some variation exists in these operations at different foundries, these variations do not significantly alter the nature or the amount of the HAP emissions from the individual emission sources...”⁴ When comparing potential VOC (and, therefore, HAP emissions) between green sand casting

¹ See 67 Fed. Reg. at 78314. Honda is using metal casting department as defined in the proposed rule.

² See 67 Fed. Reg. at 78303.

³ See 67 Fed. Reg. at 78282.

⁴ See 67 Fed. Reg. at 78281.

operations and centrifugal and permanent mold casting operations, Honda disagrees with EPA's conclusion that there are not significant differences in potential HAP emissions. There is simply not the same potential for incomplete combustion of organics during the pouring process for centrifugal and permanent mold casting. With centrifugal and permanent mold casting, the molds are made of metal – there are no organics other than minor amounts of release agents available to be combusted.

Because centrifugal and permanent mold casting generate only de minimis amounts of VOC, Honda believes that controlling these sources would provide little environmental benefit. Furthermore, although it is likely that these operations would meet the 20 ppmv VOC (as propane) limitation, Honda believes that it is inappropriate to subject these operations to the burdens of this regulation given the de minimis level of VOC and HAP emissions.

Therefore, Honda recommends that the proposed emission limitation for organic HAP emissions from new pouring, cooling and shakeout lines at a new metal casting department be amended to specifically exempt organic HAP emissions from centrifugal and permanent mold casting lines. Specifically, Honda recommends that proposed Section 63.7690(a)(7) be amended to the following language in the final rule:

“(7) You must ... all pouring, cooling, and shakeout lines, except permanent mold and centrifugal casting lines, at a new metal casting department ...”

In addition, EPA may want to include definitions for permanent mold casting line and centrifugal casting line in the final rule.

Honda appreciates this opportunity to offer comments on the proposed Iron and Steel Foundry MACT. Should there be any questions or other follow-up desired, please contact Bart Pinson at 937-644-0427 extension 3080 or e-mail bart_pinson@ham.honda.com.

Yours truly,

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