

Air Enforcement: Alabama Department of Environmental Management and Talladega County Automobile Manufacturing Plant Enter into Consent Order



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The Alabama Department of Environmental Management (“ADEM”) and Honda Development & Manufacturing of America, LLC (“Honda”) entered into a October 9th Consent Order (“CO”) addressing an alleged violation of an Air Permit. See Consent Order No. 25---___-CAP.

The CO provides that Honda operates an automobile manufacturing plant in Talladega County, Alabama.

The facility is stated to be designated Air Division Facility No. 309-0050 (“Facility”).

ADEM is stated to have issued a Major Source Operating Permit (“Permit”) on March 10, 2023, to Honda.

The Facility is stated to have been scheduled to complete a three-year retest of the RTO Fluidized Bed Carbon Adsorption System with RTO2 and Low NOx Burners (“FBCA”) to determine compliance with the BACT requirements in the MSOP. Due to instrumental data indicating the FBCA Adsorption System was not operating at the required removal efficiency, the performance test is stated to have not been started.

ADEM considers the instrumental data that indicated that FBCA Adsorption System is not meeting the required removal efficiency and that Honda’s subsequent decision to not perform the scheduled stack test to be indicative of a violation of the Permit limit.

Honda is stated to have submitted a letter on April 26, 2023, that described the reasons for not completing the required testing and possible causes of why the control system was not operating correctly. Honda indicated that the B density in the FBCA was above the manufacturer-suggested range and was the main reason for poor destruction efficiency. A subsequent test was conducted on May 23, 2023, after a carbon change on the FBCA which indicated destruction efficiency of 99.8%.

Honda installed a temporary onsite trailer monitoring system for the period of January 13 through April 17. Further, additional testing was performed on the FBCA on April 5, which showed a destruction efficiency of 92.5% and on May 21, which showed a destruction efficiency of 76.2% in order to:

- Gather information.
- Develop a temporary monitoring plan.
- Formulate options to achieve compliance with the MSOP.

Further, Honda submitted a monitoring plan for the FBCA dated June 27, which provided its plans to conduct quarterly testing.

Honda neither admits nor denies ADEM's contentions. Further, Honda prior to the events of April 26, 2023, believes that the FBCA was being operated in accordance with OEM operational recommendations in its Permit obligations with regard to operation and monitoring of equipment. Since April 26, 2023, Honda states that it is engaged in significant activities to return to and remain in compliance with the Permit.

The CO assesses a civil penalty of \$45,000.00.

A copy of the CO can be downloaded [here](#).