

Statement of Basis For Title V Permit

Part I - General	
Company Name	Honda of America (Marysville Motorcycle Plant)
Premise Number	01-80-00-0130 TVP060
What makes this facility a Title V facility?	Potential to emit VOCs
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	Honda's Marysville Motorcycle Plant (MMP) is requesting an administrative modification to PTI # 01-08869. This modification is for the removal of the thermal oxidizer associated with emission units K401, K403 and K404 (coating lines #1, #3 and #4). Ohio EPA determined that removing the thermal oxidizer from K401, K403 and K404 would have a net decrease of all emissions for the MMP. There will be no new pollutants introduced as a result of this change.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
n/a			

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Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	O R	M	St	ENF	R	St	Rp	St	ET	Mis c	Comments
		SIP (3745-)	Other												
K401, K402, K403, K404	20% opacity as a 6-minute average	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-A water curtain or fabric filters (K402) shall be operated whenever these emissions units are in operation M-Monitor any malfunction of the water curtain, while the emissions unit is in operation R-Daily records maintained of any malfunction of the water curtain Rp-Reporting requirement, with any operation of the emissions unit without the water curtain control ET-Yes, if required, Method 9 shall be employed to demonstrate compliance

K401, K403, K404	1.83 lb. PM/hr	17- 11(B)(1) Table I		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-A water curtain shall be operated whenever these emissions units are in operation M-Monitor any malfunction of the water curtain, while the emissions unit is in operation R-Daily records maintained of any malfunction of the water curtain Rp-Reporting requirement, with any operation of the emissions unit without the water curtain control ET-Yes, PM emissions shall be calculated at worst case emissions to show compliance with this limit Misc.-There are no miscellaneous requirements
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K402	0.551 tons PM/yr	17- 11(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-The coating operation shall not be operated without the use of primary and secondary filters.</p> <p>M-Monitor any malfunction of the primary and secondary filters, while the emissions unit is in operation</p> <p>R-Daily records maintained of any malfunction of the primary and secondary filters</p> <p>Rp-Reporting requirement, with any operation of the emissions unit without the primary and secondary filters</p> <p>ET-Yes, PM emissions shall be calculated at the end of each year</p>
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K401, K402 K403, K404 K408	8 lbsOC/hr 40 lbs OC/day when using any PRM coating on non-metal	21- 07(G)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes, the PRM status of all coatings, reducing solvents, purge, and cleanup when applying an OC containing material subject to the rule. R-Yes, daily recordkeeping (when using a PRM material on non-metal parts or applying a material subject to the rule) of the materials coated, the amount and OC content of each coating and PRM cleanup used when applying any PRM material, and the daily calculated OC emissions, and hourly emissions, calculated as an hourly average. Rp-Yes, reporting of deviation/exceedances of the 8/40 OC limit requirements are necessary to show compliance ET-Yes, compliance is demonstrated in the daily calculation of hourly average and total daily emissions when using any PRM on non-metal, by maintaining records of the each materials daily usage, the coating and PRM cleanup's OC content, and hours of operation; or a demonstration that potential emissions could never exceed the 8/40 limit.
P408	8 lbsOC/hr 40 lbs OC/day when using any PRM coating on non-metal	21- 07(G)(2)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Yes, mixing tanks shall be covered at all times when not mixing/measuring/cleaning tank, and operation of closed circulation system M-Yes, monitor any time periods when mixing tanks are not operated as above, and monitor the amount and percent of purge and cleanup materials sent off-site for recovery/disposal R-Yes, recordkeeping of any time period when the tanks are not operated as above and maintain records of the amount and percent of cleanup/purge recovered for off-site disposal/recovery. Rp-Yes, reporting of any time period when the mix tanks are not maintained as above ET- ET-Yes, compliance is demonstrated in the daily calculation of hourly average and total daily emissions when using any PRM on non-metal, by maintaining records of the each materials daily usage, the coating and PRM cleanup's OC content, and hours of operation; or a demonstration that potential emissions could never exceed the 8/40 limit. Misc.-There are no miscellaneous requirements

K401	VOC emissions shall not exceed 27.2 tons per rolling, 12-month period, excluding emissions from natural gas combustion.	OAC rule 3745-31-05(C) PTI # 01-08869		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Rp - YES- monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.</p> <p>M - YES - The permittee shall collect and record the name and identification of all materials, the VOC content of all coatings, the VOC content of all materials, total number of gallons for all materials, the calculated total VOC emission rate for all materials, prior to the credit for recovered materials, the rolling, 12-month VOC emissions for all materials</p> <p>ET - YES - Compliance shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions.</p>
K402	VOC emissions not to exceed 3.1 tons per rolling, 12-month period, excluding emissions from natural gas combustion.	OAC rule 3745-31-05(C) PTI # 01-08869		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Rp - YES- monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.</p> <p>M - YES - The permittee shall collect and record the name and identification of all materials, the VOC content of all coatings, the VOC content of all materials, total number of gallons for all materials, the calculated total VOC emission rate for all materials, prior to the credit for recovered materials, the rolling, 12-month VOC emissions for all materials</p> <p>ET - YES - Compliance shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions.</p>

K403	VOC emissions shall not exceed 63.6 tons per rolling, 12-month period, excluding emissions from natural gas combustion.	OAC rule 3745-31-05(C) PTI # 01-08869		N	N	Y	N	N	N	N	Y	N	Y	N	<p>Rp - YES- monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.</p> <p>M - YES - The permittee shall collect and record the name and identification of all materials, the VOC content of all coatings, the VOC content of all materials, total number of gallons for all materials, the calculated total VOC emission rate for all materials, prior to the credit for recovered materials, the rolling, 12-month VOC emissions for all materials</p> <p>ET - YES - Compliance shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions.</p>
K404	VOC emissions shall not exceed 141.2 tons per rolling, 12-month period, excluding emissions from natural gas combustion.	OAC rule 3745-31-05(C) PTI # 01-08869		N	N	N	N	N	N	Y	N	Y	N	<p>Rp - YES- monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.</p> <p>M - YES - The permittee shall collect and record the name and identification of all materials, the VOC content of all coatings, the VOC content of all materials, total number of gallons for all materials, the calculated total VOC emission rate for all materials, prior to the credit for recovered materials, the rolling, 12-month VOC emissions for all materials</p> <p>ET - YES - Compliance is determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions.</p>	

K401, K402, K403, K404	The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.	21-09(U)(1)(a); PTI# 01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	<p>M-Yes monitoring of the amount and VOC content of coatings</p> <p>R-Yes, monthly records of material usage, OC content of all coatings, and record of the annual average at the end of each year</p> <p>Rp-Yes, reporting of deviation/exceedances of the annual average OC content of coatings applied in K401, K402, K403, and K404</p> <p>ET-Yes, compliance is demonstrated in the end-of-the year calculation of average coating VOC content of all coatings applied in K401, K402, K403, K404 using the monthly records of each coating's usage</p>
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K401, K402, K403, K404	The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.	21-09(U)(1)(c); PTI# 01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	<p>M-Yes monitoring of the amount and VOC content of coatings</p> <p>R-Yes, monthly records of material usage, OC content of all coatings, and record of the annual average at the end of each year</p> <p>Rp-Yes, reporting of deviation/exceedances of the annual average OC content of coatings applied in K401, K402, K403, and K404</p> <p>ET-Yes, compliance is demonstrated in the end-of-the year calculation of average coating VOC content of all coatings applied in K401, K402, K403, K404 using the monthly records of each coating's usage</p>
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K401, K402, K403, K404	The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids	21-09(U)(1)(d); PTI# 01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes monitoring of the amount and VOC content of coatings , the he maximum pounds of VOC/gallon of coating solids and the solids content of coatings. R-Yes, monthly records of material usage, OC content of all coatings, and record of the annual average at the end of each year Rp-Yes, reporting of deviation/exceedances of the annual average OC content of coatings applied in K401, K402, K403, and K404 ET-Yes, compliance is demonstrated in the end-of-the year calculation of average coating VOC content of all coatings applied in K401, K402, K403, K404 using the monthly records of each coating's usage
K401 K402 K403 K404	VOC content of any coating shall not exceed 6.5 lbs/gal	31-05(A)(3); PTI#01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes monitoring of the VOC content of coatings R-Yes, monthly recordkeeping of each coating applied and the OC content of each Rp-Yes, submit deviation/exceedance report on any coating employed/mixed with greater than 6.5 lbs VOC/gal ET-Yes, compliance is demonstrated in the monthly recordkeeping of each coating employed/mixed and the VOC content of each and emissions testing w/i 6 months of permit issuance

P408	OC emissions from clean-up not to exceed 20.2 tons per rolling 12 months	31-05(C); PTI#01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes, monitor the amount of each coating, reducing solvent, and cleanup/purge material used each month, the OC content of each, and the amount of recovered material sent off site, if a credit is to be applied to these emissions R-Yes, recordkeeping for the rolling 12-month emissions Rp-Yes, deviation reporting of any exceedance of the rolling 12-month limit ET-Yes, monthly calculations of the OC emissions from the coatings, reducing solvents(calculated at a loss of 1%), and cleanup/purge materials (calculated at a loss of 15%) used in paint mix, including the calculation of any credit to these emissions derived from materials sent off-site for recovery, and the 12-month rolling emissions
P408	OC content of each cleanup material shall not exceed 7.85 lbs OC/gallon.	31-05(A)(3); PTI#01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes monitoring the materials used in paint mix R-Yes, daily recordkeeping of all coatings, catalysts, reducing solvents, purge and cleanup materials, their OC content, and calculated hourly (average) and daily emissions Rp-Yes, reporting of deviation/exceedances of the OC limit requirements are necessary to show compliance ET-Yes, compliance is demonstrated in the daily calculation of hourly average and total daily emissions, using 1% loss from coatings and 15% loss from cleanup/purge materials
P408	Cleanup material usage shall not exceed 38,400 gallons per rolling 12 month period	31-05(C); PTI#01-8869		N	N	Y	N	N	Y	N	Y	N	Y	N	M-Yes monitoring the materials used in paint mix and the HAP content of each R-Yes, daily recordkeeping of all coatings, catalysts, reducing solvents, purge and cleanup materials, their HAP content, and calculated potential combined and individual HAP emissions Rp-Yes, reporting of deviation/exceedances of the HAP limit requirements ET-Yes, compliance is demonstrated through the monthly calculations of combined and individual potential HAP emissions per rolling 12 months

K401, K402, K403, K404	Honda Motorcycle exempt from 21-09(U) when coating motorcycles	21- 09(U)(1)		N	N	N	N	N	N	N	N	N	N	N	N	OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance R- No recordkeeping requirements are necessary to show compliance Rp-No reporting requirements are necessary to show compliance ET-No testing requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
K401 K402, K403 K404	Potential emission limits on criteria pollutants from natural gas combustion in drying ovens	31- 05(A)(3)		N	N	N	N	N	N	N	N	N	Y	N	ET-Yes, No testing requirements are necessary to show compliance, other than the documentation of the calculated emissions, using the most recent AP-42 factors, at the potential gas usage of each oven/burner	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a

description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.