

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Honeywell International, Inc.
Premise Number	0374010117
What makes this facility a Title V facility?	CO
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)	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 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		<u>Comments</u>
	SIP (3745- )	Other	
A.I.1	N	Y	approval of CAM plan for P054 per 40 CFR Part 64
A.I.1 - P001	77-07	N	listing of insignificant emissions units that are not "de minimis".
A.I.1 - P072	77-07	N	listing of insignificant emissions units that are not "de minimis".

C **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	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745- )	Other												
P073	34.50 lbs CO/hr		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall only combust fuels that are equivalent to, or more clean burning than, benzene fuel, as stated in the permit application.
	2.70 lbs NOx/hr			N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee is limited to 8,000 gals/rolling, 12-months of benzene fuel.
	0.78 lbs OC/hr			N	Y	Y	N	N	Y	N	Y	N	Y	N	Appropriate M, R, and Rp requirements have been established to monitor the OR.
	0.10 lb PE/mmBtu			N	Y	Y	N	N	Y	N	Y	N	Y	N	M/R - Permittee is required to record and maintain records of monthly fuel usage and maintain records of any day an alternative fuel was used.

P074	136.17 lbs CO/hr 4.08 lbs NOx/hr 10.71 lbs OC/hr 0.10 lb PE/mmBtu		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall only combust gasoline.  OR - The permittee is limited to 125,000 gals/rolling, 12-months of gasoline.  Appropriate M, R, and Rp requirements have been established to monitor the OR.  M/R - Permittee is required to record and maintain records of monthly fuel usage and maintain records of any day an alternative fuel was used.
P073 P074	10% opacity, as a 6-minute average		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall combust only gasoline (P074) or fuels that are equivalent to, or more clean burning than, benzene fuel (P073). The fuels being burned in the emissions units traditionally do not cause opacity, therefore, monthly monitoring includes type of fuels used and fuel usage.  ET - The M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings. However, if required, VE testing shall be conducted in accordance with Method 9 from 40 CFR Part 60 Appendix A. COMs are not economically justified.
P073	4.16 tons NOx/yr 1.20 tons OC/yr 0.05 ton PE/yr		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	NA	N	OR - The permittee shall only combust fuels that are equivalent to, or more clean burning than, benzene fuel, as stated in the permit application.  OR - The permittee is limited to 8,000 gals/rolling, 12-months of benzene fuel.  ET - Annual emissions were based on the fuel usage restriction, therefore provided compliance with the restriction is demonstrated, compliance with the annual emission limit will be assumed.  Appropriate M, R, and Rp requirements have been established to monitor the OR.

P074	5.00 tons NOx/yr  13.13 tons OC/yr  0.88 ton PE/yr		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	NA	N	<p>OR - The permittee shall only combust gasoline.</p> <p>OR - The permittee is limited to 125,000 gals/rolling, 12-months of gasoline.</p> <p>ET - Annual emissions were based on the fuel usage restriction, therefore provided compliance with the restriction is demonstrated, compliance with the annual emission limit will be assumed.</p> <p>Appropriate M, R, and Rp requirements have been established to monitor the OR.</p>
P073  P074	53.08 tons CO/rolling, 12-months  166.88 tons CO/rolling, 12-months		31-05 (C)	N	Y	Y	N	N	Y	N	Y	N	NA	N	<p>OR - The permittee shall only combust fuels that are equivalent to, or more clean burning than, benzene fuel (P073) or gasoline (P074). The fuels used in the emissions units traditionally do not cause opacity, therefore, monthly monitoring includes type of fuels used and fuel usage.</p> <p>OR - The permittee is limited to 8,000 gals/rolling, 12-months of benzene fuel (P073) and 125,000 gals/rolling 12-months of gasoline (P074).</p> <p>ET - Annual emissions were based on the fuel usage restriction, therefore rolling, monthly records of fuel usage and CO emissions are sufficient to provide compliance with the CO limits.</p> <p>Appropriate M, R, and Rp requirements have been established to monitor the OR.</p>

P054	11.5 lbs PE/hr	17-11 (B)	40 CFR Parts 64.3(a), 64.6(c), 64.7(d), 64.8	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - The permittee shall use a scrubber to control emissions with the following operational parameters: (1) pressure drop shall be maintained at a value not less than 3.0 inches water and (2) the water flow rate shall be maintained at less than 16 gals/min.</p> <p>OR - The permittee has submitted an approved CAM plan that identified the parameters above as performance indicators. In addition, the permittee proposed an inspection and maintenance program for the scrubber and additional operating guidelines.</p> <p>Appropriate M, R, and Rp requirements have been established, including the installation of equipment to continuously monitor the pressure drop and scrubber water flow rate, scrubber inspection frequencies, and the maintenance of replacement parts, to monitor the OR.</p>
P054	20% opacity as a 6-minute average	17-07 (A)	40 CFR Parts 64.3(a), 64.6(c), 64.7(d), 64.8	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - The permittee shall use a scrubber to control emissions with the following operational parameters: (1) pressure drop shall be maintained at a value not less than 3.0 inches water and (2) the water flow rate shall be maintained at less than 16 gals/min.</p> <p>OR - The permittee has submitted an approved CAM plan that identified the parameters above as performance indicators. In addition, the permittee proposed an inspection and maintenance program for the scrubber and additional operating guidelines.</p> <p>Appropriate M, R, and Rp requirements have been established, including the installation of equipment to continuously monitor the pressure drop and scrubber water flow rate, scrubber inspection frequencies, and the maintenance of replacement parts, to monitor the OR.</p> <p>ET - The M/R &amp; Rp requirements in the permit and the additional maintenance and operating guidelines proposed in the permittee's CAM plan, are sufficient to demonstrate proper scrubber maintenance and opacity compliance without requiring formal Method 9 readings. However, if required, VE testing shall be conducted in accordance with OAC rule 3745-17-03 (B)(1). COMs are not economically justified.</p>

P073 P074	None	17-07 (A)  17-11 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	The emission limitation established pursuant to OAC rule 3745-31-05 (A)(3) is more stringent.
P073 P074	None	18-06 (G)	N	Y	N	N	N	N	N	N	N	N	N	N	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06 (B).
P073 P074	None	21-07 (B)  21-08 (B)  23-06 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.</p> <p>On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.</p>

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.

- **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.