

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Honda of America (Marysville Motorcycle Plant)	
Premise Number	01-80-00-0130 TVP033	
Number of Non-insignificant Emissions Units	52	
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 3745-77-01 (U)?	Yes	

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

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.

C If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		O R	M	R	R p	E T	M i s c	Comments
		SIP (3745-)	Oth er							
K401, K402, K403, K404	20% opacity as a 6-minute average	17- 07(A)(1)		N	N	N	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 Misc.-There are no miscellaneous requirements
K401, K403, K404	0.70 lb. PM/hr	17- 11(B)(1) Table I		Y	Y	Y	Y	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
K402	0.1 tons PM/yr	17- 11(B)(1)		Y	Y	Y	Y	Y	N	OR-The coating operation shall not be operated without the use of primary and secondary filters. M-Monitor any malfunction of the primary and secondary filters, while the emissions unit is in operation R-Daily records maintained of any malfunction of the primary and secondary filters Rp-Reporting requirement, with any operation of the emissions unit without the primary and secondary filters ET-Yes, PM emissions shall be calculated at the end of each year Misc.-There are no miscellaneous requirements

K401, K403, K404	8 lbsOC/hr 40 lbs OC/day when using any PRM coating on non-metal	21- 07(G)(2)		N	N	Y	Y	Y	N	<p>OR-No operational restrictions are necessary to show compliance 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. Misc.-There are no miscellaneous requirements</p>
P408	OC emissions shall be reduced by 85%	21- 07(G)(2)		Y	Y	Y	Y	Y	N	<p>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- Yes, monthly monitoring of the purge/cleanup materials collected for off-site recovery/disposal to document that 85% of these materials are recovered Misc.-There are no miscellaneous requirements</p>

K402	use of only non-PRM materials	21-07(G)(9)		Y	Y	Y	Y	N	N	OR-Yes, no PRM material can be applied in this emission unit M-Yes, PRM status of all powder coatings R-Yes, monthly records of material usage and documentation of PRM status Rp-Yes, reporting of the application of a PRM material in this unit ET-There are no testing requirements Misc.-There are no miscellaneous requirements
K401, K402, K403, K404	OC emissions not to exceed 7.6 lbs of VOC from prime coatings and 6.5 lbs from top coatings, both as a daily average	31-05(D); PTI# 01-493 and 01-6642		N	Y	Y	Y	Y	N	OR- No operational restrictions requirements are necessary to show compliance M-Yes monitoring of the VOC content of all prime and top coatings R-Yes, daily recordkeeping, when applying any prime coat in excess of 7.6 lbs VOC/gal and any top coat in excess of 6.5 lbs/gal, of material usage, OC content of all coatings, and average VOC content of prime and top coatings applied in K401, K402, K403, and K404 together Rp-Yes, reporting of deviation/exceedances of the daily average OC content of coatings applied ET-Yes, compliance is demonstrated in the daily calculation of the average VOC content of the prime and top coatings applied in K401, K402, K403, and K404, when applying any prime coat in excess of 7.6 lbs VOC/gal and any top coat in excess of 6.5 lbs/gal and emissions testing w/i 6 months of permit issuance Misc.-There are no miscellaneous requirements
K401, K402, K403, K404	OC emissions not to exceed 6.12 lbs of VOC, as an annual average, from all coatings applied in K401, K402, K403, K404	31-05(D); PTI# 01-493 and 01-6642		N	Y	Y	Y	Y	N	OR- No operational restrictions requirements are necessary to show compliance M-Yes monitoring of the amount and VOC 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 Misc.-There are no miscellaneous requirements

K401, K402, K403, K404	VOC emissions not to exceed 296.4 tons per year from K401, K402, K403, K404	31-05(D); PTI# 01-493 and 01-6642		N	Y	Y	Y	Y	N	OR- No operational restrictions requirements are necessary to show compliance M-Yes monitoring of the amount and VOC content of coatings and cleanup materials applied R-Yes, monthly records of material usage, OC content of all coatings and cleanup materials, and record of the annual emissions at the end of each year from K401, K402, K403, K404. Rp- Yes, reporting of deviation/exceedances of the annual VOC emission limit from K401, K402, K403, K404. ET-Yes, compliance is demonstrated in the monthly calculation of the annual emissions Misc.-There are no miscellaneous requirements
K403	VOC content of any coating shall not exceed 6.5 lbs/gal	31-05(D); PTI#01-6642		N	N	Y	Y	Y	N	OR- No operational restrictions requirements are necessary to show compliance 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 Misc.-There are no miscellaneous requirements
K403	OC emissions not to exceed 81.7 tons per rolling 12 months	31-05(D); PTI#01-6642		N	N	Y	Y	Y	N	OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance R-Yes, monthly records of material usage and OC content of all coatings and cleanup materials Rp- Yes, reporting of deviation/exceedances of the rolling 12-month limit ET-Yes, compliance is demonstrated in the monthly calculation of the rolling 12-month emissions Misc.-There are no miscellaneous requirements

K403	coating usage shall not exceed 45,000 gal/rolling 12-months	31-05(D), PTI #01-6642									OR-No operational restrictions are necessary to show compliance M-Yes, monitor the monthly usage of coatings applied R-Yes, monthly recordkeeping requirements of the amount of each coating applied and the rolling 12-month coating usage Rp-Yes, deviation reporting of any exceedance of the rolling 12-month usage limit ET-No testing requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
K402	OC emissions not to exceed 5.81 tons per rolling 12 months	31-05(D); PTI#01-8143		N	N	Y	Y	Y	N		OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance R-Yes, monthly records of material usage and OC content of all coatings and cleanup materials Rp-Yes, reporting of deviation/exceedances of the rolling 12-month limit ET-Yes, compliance is demonstrated in the monthly calculation of the rolling 12-month emissions Misc.-There are no miscellaneous requirements
K402	OC emissions not to exceed 17.2 lbs/hr from cleanup materials	31-05(D); PTI#01-8143		N	N	Y	N	Y	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-There are no reporting requirements, permitted at maximum potential use ET-Yes, compliance is demonstrated in the worst case usage calculation, using the highest OC content and maximum of usage of cleanup material in a powder coating operation Misc.-There are no miscellaneous requirements

P408	OC emissions not to exceed 24.2 tons per rolling 12 months	31-05(D); PTI#01-6639		Y	Y	Y	Y	Y	N	<p>OR-Yes, Coating mix tanks and solvent containers shall be covered at all times, except when adding materials or during cleaning of the tanks.</p> <p>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</p> <p>R-Yes, recordkeeping of the amount of each coating, reducing solvent, and cleanup/purge material used each month, the OC content of each, the amount of recovered material sent off-site from this emission unit, if a credit is to be applied, the calculations of emissions, including testing results from recovered materials sent off-site, and the rolling 12-month emissions</p> <p>Rp-Yes, deviation reporting of any exceedance of the rolling 12-month limit</p> <p>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</p> <p>Misc.-There are no miscellaneous requirements</p>
P408	OC emissions not to exceed 12.1 lbs/hr as a daily average	31-05(D); PTI#01-6639		N	Y	Y	Y	Y	N	<p>OR-No operational restrictions are necessary to show compliance</p> <p>M-Yes monitoring the materials used in paint mix</p> <p>R-Yes, daily recordkeeping of all coatings, catalysts, reducing solvents, purge and cleanup materials, their OC content, and calculated hourly (average) and daily emissions</p> <p>Rp-Yes, reporting of deviation/exceedances of the OC limit requirements are necessary to show compliance</p> <p>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</p> <p>Misc.-There are no miscellaneous requirements</p>

P408	total potential emissions of any individual HAP shall not exceed 12.0 tons and combined HAPs shall not exceed 24.2 tons per rolling 12 months	31-05(D); PTI#01-6639		N	Y	Y	Y	Y	N	OR-No operational restrictions are necessary to show compliance 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 Misc.-There are no miscellaneous requirements
K401, K402, K403, K404	Honda Motorcycle exempt from 21-09(U) when coating motorcycles	21-09(U)(1)		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
K402, K403	Potential emission limits on criteria pollutants from natural gas combustion in drying ovens	31-05(A)(3)		N	N	N	N	Y	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-Yes, No testing requirements are necessary to show compliance, other that the documentation of the calculated emissions, using the most recent AP-42 factors, at the potential gas usage of each oven/burner Misc.-There are no miscellaneous requirements

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping 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 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. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.