

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Honda R & D Americas, Inc.		
Premise Number	01-80-00-0156		
Number of Non-insignificant Emissions Units	19		
What makes this facility a Title V facility?	The facility has the potential to emit over 100 tons of CO if the sources were operated at 8760 hours per year with no control device.		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	yes		

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

- **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.

- 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	Rp	E T	M isc	Comments
		SIP (3745- )	Othe r							
B001, B005, B006, B007, B011, K001, K002, P005, P006	20% opacity as a 6-minute average	17- 07(A)(1)		N	N	N	N	Y	N	OR-No operational restrictions are necessary to show compliance M-No monitoring is necessary to show compliance R-No recordkeeping is necessary to show compliance Rp-No reporting requirements are necessary to show compliance ET-If required, Method 9 shall be employed to demonstrate compliance Misc.-There are no miscellaneous requirements
B013, B014, B015, B016, B018, B019	20% opacity as a 6-minute average	17- 07(A)(1)		N	Y	Y	Y	Y	N	OR-No operational restrictions are necessary to show compliance M-Yes, weekly checks for visible emissions when emission units are in operation R-Yes, log maintained of color, cause, duration of visible emissions, and corrective action to eliminate them Rp-Yes, facility shall submit semiannual reports identifying all days when visible emissions are observed and corrective actions taken ET-If required, Method 9 shall be employed to demonstrate compliance Misc.-There are no miscellaneous requirements
B001, B005, B006, B011	0.02 lb. PM/mmBtu	17- 10(B)(1)		N	N	N	N	Y	N	OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance with PM emissions from natural gas R-No recordkeeping requirements are necessary to show compliance with PM emissions from natural gas Rp-No reporting requirements are necessary to show compliance with PM emissions from natural gas ET-Yes, compliance is demonstrated in the calculation of emissions, at the maximum capacity of the unit, using the applicable AP-42 factor Misc.-There are no miscellaneous requirements
P005 P006	0.02 lb. PM/mmBtu	17- 10(B)(1)		N	N	N	N	Y	N	OR-No operational restrictions are necessary to show compliance, except must use natural gas M-No monitoring requirements are necessary to show compliance with PM emissions from natural gas R-No monitoring requirements are necessary to show compliance with PM emissions from natural gas Rp-No monitoring requirements are necessary to show compliance with PM emissions from natural gas ET-Yes, compliance is demonstrated in the calculation of emissions, at the maximum capacity of the unit, using the applicable AP-42 factor Misc.-There are no miscellaneous requirements

K001 K002	0.551 lb. PM/hr 2.41 tons PM/yr	17- 11(B)(1) Table I		Y	N	Y	Y	Y	N	OR-Yes, the source shall not be operated without the water curtain control M-No monitoring requirements are necessary to show compliance with this PM limit R-Yes, the facility shall maintain daily records of coating usage and PM emission calculations and document any period when the coating operation was operated without the water curtain control Rp-Yes, deviation reporting of incidents when the coating operation was operated without the water curtain control ET-Yes, PM emissions shall be calculated using records of material use and PM content, transfer efficiency shall be calculated at 65% and water wash control at 95% Misc.-There are no miscellaneous requirements
B013, B014, B015, B016, B018, B019	0.310 lb PM/mmBtu for small internal combustion engines	17- 11(B)(5)(a)		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, PTI PM limit requirements are more stringent than this rule; compliance is demonstrated in the calculation of emissions, at the maximum capacity of the unit, using the applicable AP-42 factor; if required, Methods 1 through 5 (appropriate methods) shall be employed to demonstrate compliance Misc.-There are no miscellaneous requirements
B007	0.062 lb PM/mmBtu for large internal combustion engines	17- 11(B)(5)(b)		N	N	N	N	Y	N	OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance with R-No recordkeeping requirements are necessary to show compliance Rp-No reporting requirements are necessary to show compliance ET-Yes, compliance is demonstrated in the calculation of emissions, at the maximum capacity of the unit, using the applicable AP-42 factor; if required, Method 1 through 5 shall be employed to demonstrate compliance Misc.-There are no miscellaneous requirements
B001, B005, B006, B011	Exempt when using natural gas	18-06(A)		Y	N	N	N	N	N	OR-Yes, only natural gas shall be used in this unit M-No monitoring requirements are necessary to show compliance with PM emissions from natural gas R-No recordkeeping requirements are necessary to show compliance with PM emissions from natural gas Rp-No, however, facility shall report incidence of any day in which a fuel other than natural gas was used ET-No testing requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
B007	SO2 emissions not to exceed 0.5 lbs/mmBtu	18-06(G)		Y	Y	Y	Y	Y	N	OR-Yes, only diesel fuel oil with a sulfur content that will comply with 0.5 lb SO2/mmBtu shall be used in this unit M-Yes the sulfur and heat content of each oil shipment received shall be monitored R-Yes, facility shall maintain records of sulfur and heat content and amount of oil received for each shipment Rp-Yes, facility shall report incidence of any record of an exceedance of the 0.5 lb SO2/mmBtu or and incidence of the use of a fuel other than diesel fuel oil ET-Yes, the sulfur and heat content of each shipment of oil shall be tested and maintained; emissions shall be calculated as per OAC 3745-18-04(F)(2) Misc.-There are no miscellaneous requirements

P005 P006	3 lbs OC/hr 15 lbs OC/day when using any PRM coating on non-metal	21- 07(G)(1)		N	Y	Y	Y	Y	N	OR-No operational restrictions are necessary to show compliance M-Yes, material usage when coating plastic parts R-Yes, records of materials coated, material usage, PRM status, and calculated hourly (average) and daily emissions per the booth/oven split, when coating plastic parts Rp-Yes, reporting of deviation/exceedances of the 3/15 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 PRM, using records of daily usage and coating OC content, and splitting emissions between the booth and oven (at 73%/27%) Misc.-There are no miscellaneous requirements
K001 K002	8 lbsOC/hr 40 lbs OC/day when using any PRM coating on non-metal	21- 07(G)(2)		N	Y	Y	Y	Y	N	OR-No operational restrictions are necessary to show compliance M-Yes, material usage when coating plastic parts R-Yes, records of materials coated, material usage, PRM status, and calculated hourly (average) and daily emissions per the booth/oven split, when coating plastic parts 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 PRM, using records of daily usage and coating OC content, and splitting emissions between the booth and oven (at 73%/27%) Misc.-There are no miscellaneous requirements
B012, B013, B014, B015, B016, B017, B018, B019, B020, B021	control of carbon monoxide from stationary sources by use of the best available control technology & operating practices, as required in the PTIs	21-08(B)		N	N	N	N	N	N	OR-No operational restrictions are necessary to show compliance M-No monitoring requirements are necessary to show compliance with 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
K001 K002	10 gallons coating/day when coating metal	21-09(U) (2)(e)(ii)		N	Y	Y	Y	N	N	OR-No operational restrictions are necessary to show compliance M-Yes, monitor the amount of coating used each day R-Yes, recordkeeping requirements for the amount of coating applied to metal parts each day Rp-Yes, deviation reporting of any exceedance of the 10 gallon usage limit per day ET-No testing requirements are necessary to show compliance, other than recordkeeping of the coating usage Misc.-There are no miscellaneous requirements

T001 T002 T003	Exempt from requirements of 21-09(L), tanks with less than 40,000 gal capacity : no records of liquids stored and vapor pressure, and no internal floating roof required	21-09(L)		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 reporting requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
G001	Stage I vapor control, 90% control of VOCs	21-09(R)		Y	Y	Y	Y	N	N	OR-Yes, submerged fill, Stage I vapor control, and system maintenance M-Yes, inspections, leak detection, and maintenance R-Yes, records of inspections Rp-Yes, reports of leak repairs not completed within 15 days of detection ET-No testing requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
B012, B013, B014, B015, B016, B017, B018, B019, B020, B021	control of nitrogen oxides from stationary sources by use of the latest available control techniques & operating practices, as required in the PTIs	23-06(B)		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 reporting requirements are necessary to show compliance Misc.-There are no miscellaneous requirements
B001, B005, B006, B011	Track Natural Gas use		40 CFR 60 Subp art Dc	Y	N	Y	Y	N	N	OR-Yes, only natural gas shall be used in this unit M-No monitoring is required when using natural gas R-Yes, facility shall maintain daily records of natural gas usage Rp-Yes, facility shall report incidence of any day in which fuel usage records were not maintained or fuel other than natural gas used ET-No emission testing is required when using natural gas 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

• **Instructions for Part III:**

- 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.

- 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.

- 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.