

# Statement of Basis For Title V Permit

## Part I - General

|  |  |
|--|--|
| Company Name   | Insulfoam  |
| Premise Number   | 0125182441   |
| What makes this facility a Title V facility?   | OC   |
| 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, there are no "common control" issues associated with this facility in terms of one versus two facilities. However, there are common controls in terms of controlling several emissions units thru an RTO. That is, the RTO controls 100% of emissions from the PTE surrounding the resin bead aging area (P004), the RTO also controls an estimated 70% of emissions from the pre-expansion chamber on both pre-expanders (P002, P003) and the vacuum system on both block mold machines (P005, P006). The overall capture efficiency has been estimated at 85%. |
| 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) | Emission units P002, P003, P004, P005, and P006 in PTI 01-12022 replace the EPS processing line P001 that was established in PTI 01-8760. The Operational Restriction based on annual production weight for the different pentane content resin beads has been superceded by a rolling, 12-month average emission rate.  |
| 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  | N/A  |

rule 3745-77-08(E)

**Part II (State and Federally Enforceable Requirements)**

| Term and Condition<br>(paragraph) | Basis              |       | <u>Comments</u>  |
|-----------------------------------|--------------------|-------|--|
|                                   | SIP<br>(3745-<br>) | Other |  |
| Part II.A.                        | 31-05              | N     | The terms was incorporated to restrict emissions units contained within the Title V to certain amounts to avoid being subject to a major stationary source modification. |
| Part II.B.2.                      |                    | N     | Compliance with Ohio EPA toxic policy for pentane emissions.   |

**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<br>(3745- )                                    | Other |    |    |   |    |     |   |    |    |    |    |      |  |
| P002  | 1.64 lbs<br>OC/hr<br>from RTO<br>stack<br><br>14.04 lbs<br>OC/hr as<br>fugitive<br>emission | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n     | n  | n  | n | n  | n   | n | n  | n  | n  | y  | n    | T: Testing required to show compliance with 95% destruction efficiency across the RTO as required in section A.V.1.c for emission unit ID P004. However, this requirement is also listed in the air PTI. |

|      |   |  |   |   |   |   |   |   |   |   |   |   |   |   |   |
|------|---|--|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P002 | 28.9 tons<br>OC/yr  | 31-05(c)<br><br>(PTI #<br>01-<br>12022)            | n | n | y | y | n | n | y | n | y | n | n | n | OR: EPS resin beads usage restricted to 28.9 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring of weight and corresponding pentane content of resin bead usage.<br>R: Monthly record keeping required for maintaining rolling, 12-month emission rate.<br>Rp: Quarterly reporting requirements for exceedence of rolling, 12-month emission rate.<br>T:<br>However, all the above requirements are also listed in the air PTI. |
| P003 | 1.64 lbs<br>OC/hr<br>from RTO<br>stack<br><br>14.04 lbs<br>OC/hr as<br>fugitive<br>emission | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | n | n | n | n | n | n | n | n | y | n | T: Testing required to show compliance with 95% destruction efficiency across the RTO as required in section A.V.1.c for emission unit ID P004. However, this requirement is also listed in the air PTI.  |
| P003 | 28.9 tons<br>OC/yr  | 31-05(c)<br><br>(PTI #<br>01-<br>12022)            | n | n | y | y | n | n | y | n | y | n | n | n | OR: EPS resin beads usage restricted to 28.9 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring weight and corresponding pentane content of resin bead usage.<br>R: Monthly record keeping required for maintaining rolling, 12-month emission rate.<br>Rp: Quarterly reporting requirements for exceedence of rolling, 12-month emission rate.<br>However, all the above requirements are also listed in the air PTI.          |
| P003 | 1.64 lbs<br>OC/hr<br>from RTO<br>stack<br><br>14.04 lbs<br>OC/hr as<br>fugitive<br>emission | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | n | n | n | n | n | n | n | n | y | n | OR:<br>M:<br>R:<br>Rp:<br>T: Testing required to show compliance with 95% destruction efficiency across the RTO. However, this requirement is also listed in the air PTI.   |

|      |   |  |   |   |   |   |   |   |   |   |   |   |   |   |   |
|------|---|--|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P003 | 28.9 tons<br>OC/yr  | 31-<br>05(C)<br><br>(PTI #<br>01-<br>12022)        | n | n | y | y | n | n | y | n | y | n | n | n | OR: EPS resin beads usage restricted to 28.9 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring requirements are necessary to show compliance.<br>R: Monthly record keeping requirements are necessary to show compliance.<br>Rp: Reporting requirements are necessary to show compliance.<br>However, all the above requirements are also listed in the air PTI. |
| P004 | 5.85 lbs<br>OC/hr<br>from RTO<br>stack  | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | y | y | n | n | y | n | y | n | n | n | OR: Maintain compliance with Method 204<br>M: Differential pressure across PTE<br>R: Weight of EPS processed daily<br>Rp: Deviation on differential pressure<br>T: Testing required to show compliance with 95% destruction efficiency across the RTO.<br>However, all the above requirements are also listed in the air PTI.   |
| P004 | 8.3 tons<br>OC/yr   | 31-<br>05(C)<br><br>(PTI #<br>01-<br>12022)        | n | n | n | n | n | n | y | n | y | n | n | n | R: Weight of EPS processed monthly<br>Rp: Exceedance of rolling, 12-month limitation.<br>However, all the above requirements are also listed in the air PTI.  |
| P005 | 2.34 lbs<br>OC/hr<br>from RTO<br>stack<br><br>19.89 lbs<br>OC/hr as<br>fugitive<br>emission | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | n | n | n | n | n | n | n | n | y | n | OR:<br>M:<br>R:<br>Rp:<br>T: Testing required to show compliance with 95% destruction efficiency across the RTO.<br>However, this requirement is also listed in the air PTI.  |

|      |   |  |   |   |   |   |   |   |   |   |   |   |   |   |   |
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| P005 | 35.6 tons<br>OC/yr  | 31-<br>05(D)<br><br>(PTI #<br>01-<br>12022)        | n | n | y | y | n | n | y | n | y | n | n | n | OR: EPS resin beads usage restricted to 35.6 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring requirements are necessary to show compliance.<br>R: Daily record keeping requirements are necessary to show compliance.<br>Rp: Reporting requirements are necessary to show compliance.<br>However, all the above requirements are also listed in the air PTI. |
| P006 | 2.34 lbs<br>OC/hr<br>from RTO<br>stack<br><br>19.89 lbs<br>OC/hr as<br>fugitive<br>emission | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | n | n | n | n | n | n | n | n | y | n | OR:<br>M:<br>R:<br>Rp:<br>T: Testing required to show compliance with 95% destruction efficiency across the RTO.<br>However, this requirement is also listed in the air PTI.  |
| P006 | 35.6 tons<br>OC/yr  | 31-<br>05(D)<br><br>(PTI #<br>01-<br>12022)        | n | n | y | y | n | n | y | n | y | n | n | n | OR: EPS resin beads usage restricted to 35.6 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring requirements are necessary to show compliance.<br>R: Daily record keeping requirements are necessary to show compliance.<br>Rp: Reporting requirements are necessary to show compliance.<br>However, all the above requirements are also listed in the air PTI. |
| P007 | 58 lbs<br>OC/hr as<br>fugitive<br>emission  | 31-<br>05(A)(3<br>)<br><br>(PTI #<br>01-<br>12022) | n | n | n | n | n | n | n | n | n | n | y | n | OR:<br>M:<br>R:<br>Rp:<br>T: Emission factor and calculations supplied by applicant.<br>However, this requirement is also listed in the air PTI.  |

|      |                     |   |   |   |   |   |   |   |   |   |   |   |   |   |   |  |
|------|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|--|
| P007 | 99.54 tons<br>OC/yr | 31-<br>05(D)<br><br>(PTI #<br>01-<br>12022) | n | n | y | y | n | n | y | n | y | n | n | n | n | OR: EPS resin beads usage restricted to 99.54 tons OC maximum per rolling, 12-month period.<br>M: Daily monitoring requirements are necessary to show compliance.<br>R: Monthly record keeping requirements are necessary to show compliance.<br>Rp: Reporting requirements are necessary to show compliance.<br>However, all the above requirements are also listed in the air PTI. |
|------|---------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|--|

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.