

## Statement of Basis For Title V Permit

Company Name	Zehrco-Giancola Composites, Inc.	
Premise Number	02 04 01 0265	
What makes this facility a Title V facility?	HAPs	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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)	NA	
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)	NA	
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)	NA	

<p>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)</p>	<ul style="list-style-type: none"> <li>- Language has been updated and the authority for terms has been added to emissions units P001, P002, P004, P005, P006 and R001.</li> <li>- Facility-wide requirements for 40 CFR 63, subpart WWWW was added into part II of the permit. Emissions unit specific requirements were incorporated into emissions units P001, P002, P004, P005 and P006.</li> <li>- Emissions unit R001 will be subject to 40 CFR 63 part PPPP; these requirements have been incorporated into part II of the permit and into emissions unit R001.</li> <li>- Emissions unit Z001 was moved from the state only to the state and federal side of part II of the permit.</li> <li>- Emissions units P003 and P008 have been removed from the permit as they no longer exist.</li> <li>- PTI No. 02-2866 for emissions units P001, P002 and P004 has been referenced in the renewal permit.</li> <li>- PTI No. 02-9122 for emissions unit P005 has been referenced in the renewal permit.</li> <li>- PTI No. 02-0566 for emissions unit P006 has been referenced in the renewal permit.</li> <li>- PTI No. 02-2552 was effective December 21, 1998, for emissions unit P007. Emissions unit P007 has been incorporated into the renewal permit.</li> <li>- PTI No. 02-22186 was effective on November 14, 2006 for emissions units P009-P029. Emissions units P009-P029 have been incorporated into the renewal permit.</li> <li>- Emission limit of 8 lbs OC/hour and 40 lbs OC/day, based upon OAC rule 3745-21-07(G)(2), was removed from emissions units P002, P005 and P006 and was omitted from P007 as no chemical reaction occurs in these mixers.</li> <li>- The citation for the emission factor used in emissions units P002, P005 and P006 was changed from AP-42 Section 6.4.1 (this section of AP-42 has been withdrawn) to Table 5-2 "Average HAP Emissions Equations by Process" in US EPA's document "Hazardous Air Pollutant Emissions from the Production of Reinforced Plastic Composites Background Information Document for Proposed Standards". The actual emissions factor has not changed.</li> <li>- The annual emissions report in emissions unit P006 has been removed as redundant.</li> <li>- The emission factor used in emissions units P001 and P004 was changed from 2% to 0.347% of the HAP (styrene) based upon emissions testing on Sept. 18, 2006, at P004.</li> </ul>
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<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
1.	77-01 (U)(3)		Z001, a natural-gas fired drying oven for painted plastic parts, is an insignificant emissions unit.
2.-14.	N	40 CFR 63, Subpart WWWW	MACT for Reinforced Plastic Composites Production applies to P001, P002- P007, P009-P029. Compliance date for this rule was April 21, 2006. This facility is subject to work practice standards in the rule.

15.-26.	N	40 CFR 63, Subpart PPPP	MACT for Surface Coating of Plastic Parts and Products applies to R001. Compliance date for this rule is April 19, 2007. EU applies general use coatings and will demonstrate compliance using the emission limit without add-on control equipment.
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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 & 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	Comments
		SIP (3745- )	Other												
P001, P004	8 lbs OC/hr and 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - compliance for the SMC machines will be determined by calculations. Emission factor was determined during testing of P004 on 9/18/2006.
P002, P005, P006, P007	NA	21-07 (G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - P002, P005, P006 and P007 are mixers. When mixing, with no chemical reaction, OAC rule does not apply.
P009- P029	NA	21-07 (G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - P009-P029 are compression mold presses. OAC rule does not apply as no liquid organic compounds are employed.
R001	8 lbs OC/hr & 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	St - This is an older PTI and does not contain any M, R, or Rp for this coating booth.
R001	0.551 lb PE/hour	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	St - This is an older PTI and does not contain any M, R, or Rp for this coating booth.
R001	20 % opacity	17-07 (A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	St - This is an older PTI and does not contain any M, R, or Rp. Inherently clean VE checks were included for this coating booth.

P001, P002, P004	See Comments	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	PTI No. 02-2866, effective Oct. 16, 1986 for P001, P002 and P004. BAT in PTI is compliance with the applicable rule, OAC rule 3745-21-07 (G). See above.
P005	8 lbs OC/hr, 32 lbs/day & 5.84 TPY	31-05 (A)(3)	N	N	N	Y	Y	N	Y	Y	Y	Y	N	N	PTI No. 02-9122 effective June 14, 1995 & modified on August 16, 1995. ET-compliance determination is based upon calculations
P006	2.64 lb/hr, 40 lbs/day & 7.3 tpy OC from mixing; 2.4 lbs/hr, 19.2 lbs/day & 3.51 tpy OC from cleanup	31-.5 (A)(3)	N	N	Y	Y	N	N	Y	Y	Y	Y	N	N	PTI No. 02-0566 effective November 6, 1996. BAT as listed.  OR - no photochemically reactive materials may be used for cleanup ET - compliance determination is based upon calculations
P007	2.42 lb/hr, 40 lbs/day, 7.3 tpo OC from mixing; 19.8 lbs/day, 3.61 tpy OC from cleanup	31-05 (A)(3)	N	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	PTI No, 02-2552 effective December 21, 1998 OR - the use of only non photochemically reactive OC materials for cleanup ET- based upon calculations
P009, P010, P012, P015, P016, P017, P018, P019, P020, P023, P028, P029	14.2 lbs VOC/HAP per day and 2.6 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - compliance is determined using calculations for these compression mold presses.
P011, P013	2.7 lbs VOC/HAP per day and 0.5 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - compliance is determined using calculations for these compression mold presses.

P014, P021, P022, P024, P025, P026, P027	40 lbs VOC/HAP per day and 7.3 tons per year.	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - compliance is determined using calculations for these compression mold presses.
R001	See Comments	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	PTI No. 02-1805, effective Dec. 28, 1984. BAT was determined to be compliance with OAC rule 3745-21-07 (G)(2).
P001, P004	work practice standards (WPS)	N	40 CFR 63 subpart WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	WPS-Close or cover resin delivery system to doctor box and use nylon containing film to enclose SMC. Rp- found in Part II.10. And II.15. ET-perform WPS, keep certified statement of compliance. Permit includes R & Rp.
P002, P005, P006, P007	WPS	N	40 CFR 63 subpart WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	WPS-close mixer covers and vents when mixing and mixer covers have no visible gaps as detailed in A.I.2.a-c. Rp- found in Part II.10 and 15. ET-perform WPS, keep certified statement of compliance. Permit includes R & Rp.
P009-P029	WPS	N	40 CFR 63 subpart WWWW	N	Y	Y	N	N	Y	N	Y	N	N	N	WPS-unwrap, uncover or expose only one charge per mold cycle per mold machine as detailed in A.I.2.a M, R in A.III.2. ET-perform WPS, keep certified statement of compliance
R001	0.16 lb organic HAP/lb coating solids used	N	40 CFR 63 subpart PPPP	N	N	Y	N	N	Y	N	Y	N	N	N	This emissions unit is subject to subpart PPPP as an existing emissions unit.

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.
4. 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.