

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Picken's Plastics
Premise Number	02 04 03 0269
What makes this facility a Title V facility?	HAP
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)

Part II

1. Insignificant emissions units were added along with the applicable PTI numbers.
2. - 3. Requirements from 40 CFR Part 63, Subpart WWWW were included here.
4. -12. Requirements from 40 CFR Part 63, Subpart PPPP were included here.

Part III

Language was updated in all the emissions units.  
The Authority for Terms was added to each term as appropriate.

Emissions units P004 - P010, R007 and P901 have received Permits to Install since the TV permit was issued on 2/19/2001. These emissions units have been included in the permit. All cleanup emissions are now permitted in P901.

Emissions units R001, R004, R005 and R006  
40 CFR Part 63, Subpart WWWW was cited as an applicable rule.  
Emissions calculations were changed to include factors from Table 1 of 40 CFR Part 63, Subpart WWWW.

Emissions units R001, R004 and R005  
Monitoring, record keeping and reporting requirements for non photochemically reactive cleanup materials were omitted. All cleanup emissions are now included in P901.

Emissions unit R003  
Requirements from 40 CFR Part 63, Subpart RRRR were included.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (374 5- )	Other	
1.			Insignificant emissions units are listed.
2. - 3.		40 CFR	Subpart WWWW requirements
4. - 12.		40 CFR	Subpart PPPP requirements

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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P004, P005, P006, P007, P008, P009, P010	7.3 tons VOC per year	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
P004, P005, P006, P007, P008, P009, P010		21-07 (G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The requirements of OAC rule do not apply as no liquid organic material is employed in these presses.

P004, P005, P006, P007, P008, P009, P010	Work practice requireme nts	N	40 CFR 63, Sub- part WW WW	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Work practice requirements for compression presses in the MACT rule.  ET - Compliance is demonstrated by record keeping specified in the MACT rule.
P901	1500 lbs OC/month & 9.0 tpy	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Acetone is the only OC which may be used for cleaning of fixtures and equipment with an acetone rag wipe. ET - The compliance demonstration is based upon record keeping and calculations.
P901	Work practice requireme nts	N	40 CFR 63, Sub- part WW WW	N	N	N	N	N	N	N	N	N	N	N	Facility-wide work practice requirements are specified in Part II of the permit.
R001, R004, R005	See Comment	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	Compliance with BAT was determined to be compliance with OAC rule 3745-21-07(G)(2).
R001, R004, R005	8 lbs OC per hr & 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R003	7.3 Tons OC/year	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R003	8 lbs OC per hr & 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R003	0.551 LB PE/hr	17-1 1 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use dry filtration system when eu in operation ET - The compliance demonstration is based upon calculations.
R003	20% opacity as a 6-min ave	17-07 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use dry filtration system when eu in operation ET - RM 9, if requested

R003	0.16 lb org HAP/lb coating solids	N	40 CFR 63, PP PP	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R006	see comment	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Limit - 7.3 tons OC per year, excluding cleanup. 300 lbs OC per month and 7.8 tpy from cleanup OR - only non-PRx materials may be used for cleanup ET - The compliance demonstration is based upon record keeping and calculations.
R006	8 lbs OC per hr & 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R007	7.3 tons OC/year	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The compliance demonstration is based upon record keeping and calculations.
R007	see comment	21-07 (G)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The requirements of OAC rule 3745-21-07(G)(2) do not apply to resin transfer molding as the process does not occur in the presence of oxygen.
R007	Work practice requirements	N	40 CFR 63, Subpart WW WW	N	N	N	N	N	N	N	N	N	N	N	Facility-wide work practice requirements are specified Attachment A to the permit (40 CFR Part 63, Subpart WWWW).

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.