

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Hadlock Plastics, Inc.
Premise Number	02 04 03 0272
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.	
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)	Language has been updated. Authority for terms has been added. Emissions unit P002 has been removed from this plant. This emissions unit is now permitted in Plant 3. Emissions unit P003 is not included in this permit as it no longer exists. New emissions units P004-P012 are included. (Z002 from the original TV permit is now permitted as P004.) 40 CFR Part 63, Subparts PPPP, WWWW and A are included in the permit.

## Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
1.			Facility is defined
2.	77-07 (A)(13)		Insignificant emissions unit P001
3. - 5.	40 CFR Part 63, Subpart WWWW, including Subpart A requirements		
6. - 16.	40 CFR Part 63, Subpart PPPP, including Subpart A 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	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P004	80 lbs OC /day & 14.7 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping.
P004	See Comment	21-07 (G)(2)	Y	N	N	N	N	N	N	N	N	N	N	N	OAC rule does not apply via OAC rule 3745-21-01 (C)(5).
P004	WPS	N	40 CFR 63, Subpart WWWW	N	N	Y	N	N	Y	N	Y	N	N	N	WPS for cleanup material is to not use any HAP-containing materials for cleanup.

P005 P006 P007 P008 P009 P010 P011 P012	WPS	N	40 CFR 63, Subpa rt WWW W	N	Y	Y	N	N	Y	N	Y	N	N	N	WPS for mold presses is to uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine.
P004 P005 P006 P007 P008 P009 P010 P011 P012	see comment	N	40 CFR 63, Subpa rt A	N	N	N	N	N	N	N	N	N	N	N	Applicable sections of the General Provisions rule.
P005	172.8 lbs HAP/VOC per day and 31.54 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping.
P006 P007	7 lbs HAP/VOC per day and 1.26 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
P008	30 lbs HAP/VOC per day and 5.52 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
P009	24 lbs HAP/VOC per day and 4.42 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
P010 P011	35 lbs HAP/VOC per day and 6.31 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
P012	61 lbs HAP/VOC per day and 11.04 tpy	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.

R001 R002 R003 R004 R005 R006 R007 R008 R009 R010	7.3 tons OC/year	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
R001 R002 R003 R004 R005 R006 R007 R008 R009 R010	8 lbs OC/hour & 40 lbs/day	21-07 (G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
R003 R004 R005 R006 R007 R010	0.551 lb/PE hour	17-11	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use of dry filter  ET - Compliance demonstration based upon calculations.
R003 R004 R005 R006 R007 R010	20% opacity	17-07 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use of dry filter  ET - RM 9
R001 R002 R008 P009 R010	Table 3 limits	N	40 CFR 63, Subpa rt WWW W	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.

R001 R002 R008 P009 R010	General Provisions Rule for Subpart WWWW	N	40 CFR 63, Subpart A	N	N	N	N	N	N	N	N	N	N	N	
R003 R004 R005 R006 R007 R010	0.16 lb organic HAP per lb coating solids	N	40 CFR 63, Subpart PPPP	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance demonstration based upon monitoring, record keeping and calculations.
R003 R004 R005 R006 R007 R010	General Provisions Rule for Subpart PPPP	N	40 CFR 63, Subpart A	N	N	N	N	N	N	N	N	N	N	N	

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.

**C** **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.