

Statement of Basis For Title V Permit

Part I - General	
Company Name	Warren Metal Lithography - Penn Wheeling Closure
Premise Number	02-78-08-0620
What makes this facility a Title V facility?	VOC
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Five sheet coating lines vent to a common catalytic incineration system. Each coater has its own capture system. A synthetic minor permit to install was issued that has a daily facility wide VOC emission rate from the control device. A facility wide rolling 12-month limit was also set for the facility. The control system must meet requirements of OAC rule 3745-21-09(B)(6).
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)	Permittee to submit an emission control action plan in accordance with OAC chapter 3745-25. Included revised language for insignificant emissions units. Added language in accordance with 40 CFR Part 64 (CAM). Added requirements from synthetic minor PTI 02-22157, including HAP limits below the major source thresholds to avoid MACT. Added authority citations for terms and conditions. Added results of a capture efficiency test that was performed in March, 1999.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1	25-03		Facility to submit emission control action plan to be filed.
A.2		40CFR Part 64	Facility is subject to the Compliance Assurance Monitoring plan. Facility plan filed and detailed in Part III.
A.3	31-03 (A)(1)(w)		Listing of insignificant emissions units

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	<u>Comments</u>
		SIP (3745-)	Other												
K001, K002, K003, K004, and K005	81% overall reduction of VOC's	21-09 (B)(6)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- temp. restriction for catalytic bed incinerator from SIP 3745-21-09(B)(3)(j)

K001, K002, K003, K004, and K005		21-09 (U)		Y	Y	Y	N	N	Y	N	Y	N	Y	N	Facility shall comply with 21-09(B)(6) in lieu of complying with 21-09(U)
K001, K002, K003, K004, and K005	810 lb. VOC/day	35-07 (B) 31-05 (C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	810#/day short term limit based on BAT, OAC 3745 -31-05, with use of controls(incineration)
K001, K002, K003, K004, and K005	149 tpy VOC	35-07 (B) 31-05 (C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Ton per year limit after controls, established per BAT , OAC 3745-31-05, to avoid PSD review limits.
K001, K002, K003, K004, and K005	9.9 tpy individual HAP 24.9 tpy combined HAP	35-07 (B) 31-05 (C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Ton per year limit after controls, established to stay below MACT limitations.
K001, K002, K003, K004, and K005		31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	The requirements of this rule also include the requirements of 35-07(B), 31-05(C), and 21-09(B)(6).
K001, K002, K003, K004, and K005		40 CFR Part 64		N	Y	Y	N	N	Y	N	Y	N	Y	N	Requirements contained within Part III.

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.