

Statement of Basis For Title V Permit

Part I - General	
Company Name	Pro-Tec Coating Company
Premise Number	03-69-00-0025
What makes this facility a Title V facility?	NOx, CO
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)	<p>P001 PTI 03-16048 issued June 17, 2004 as an administrative modification to increase the maximum firing rate and the respective emission rates for the pollutants. Company did not physically modify the emissions unit, the unit was always capable of firing at this emission rate.</p> <p>B001, B002, B043, B044 PTI 03-14070 (Chapter 31 modification of PTI 03-6093 issued August 31, 2000) issued August 28, 2003 to physically and permanently derate the maximum capacity of each boiler from a heat input of 20.9 to 14.7 mmBtu/hr.</p> <p>B001, B002, B043, B044 PTI 03-14070 (modification) issued November 8, 2007 to adjust NOx limits to comply Consent Decree with the United States of America - Civil Action No. 3:98CV 7749.</p>
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)	P001 & P010 - addition of CAM terms; B001, B002, B043, B044 - addition of subpart Dc monitoring & reporting term; For all emissions units (B001, B002, B043, B044, K001, P001 & P010) added authority terms and PTI issuance dates.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

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	Comments
		SIP (3745-)	Other												
B001, B002, B043, B044	0.033 lb NOx/mmbtu	N	Y	Y	Y	Y	N	Y	Y	N	Y	N	N	N	Basis-Consent decree ND-emission limitation specified is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified. ET- none per Ohio EPA engineering guide 16 CAM is currently not applicable

B001, B002, B043, B044	0.49 lb NOx/hr, 2.15 tons NOx/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified.</p> <p>ET- none per Ohio EPA engineering guide 16</p> <p>CAM is not currently applicable.</p>
B001, B002, B043, B044	0.54 lb CO/hr, 2.4 tons CO/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified.</p> <p>ET- none per Ohio EPA engineering guide 16</p> <p>CAM is not currently applicable.</p>
B001, B002, B043, B044	0.11 lb PE/hr, 0.5 ton PE/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified.</p> <p>ET-The M/R and Rp requirements are sufficient to demonstrate compliance.</p> <p>CAM is currently not applicable</p>
B001, B002, B043, B044	20% opacity except as provided by rule	17- 07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified.</p> <p>ET-The M/R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings be conducted.</p> <p>CAM is currently not applicable</p>

B001, B002, B043, B044	NONE	18-06	N	Y	Y	Y	N	N	Y	N	Y	N	N	N	ND-no SO2 emission limitation established because this emissions unit only employs natural gas as fuel. OR-unit restricted to combustion of only natural gas, monitoring, record keeping, reporting requirements specified. ET-no emission limitation established CAM is currently not applicable
B001, B002, B043, B044	NONE	17-10(B)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) M/R, Rp, ET - no emission limitation established
B001, B002, B043, B044	NONE	23-06(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with BAT. M/R, Rp, ET - no emission limitation established
B001, B002, B043, B044	NONE	21-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with BAT. M/R, Rp, ET - no emission limitation established
K001	2.6 lbs VOC/gal- water	21-09(E)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable
K001	0.28 kg VOC/lit solids	Part 60, Subpart TT	N	N	N	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable
K001	42.0 lbs VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI. M/R, Rp and ET- Emission limit represents PTE CAM is currently not applicable

K001	24.44 tpy	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>ET-The M/R and Rp requirements are sufficient to demonstrate compliance.</p> <p>CAM is currently not applicable.</p>
K001	0.1 lb PE/hr, 0.44 tpy	N	Y	N	N	N	N	N	N	N	N	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>M, R, Rp-limits based on particulate in coating, monitoring would not aid in compliance determination</p> <p>ET-no emissions testing required pursuant to EG#16, compliance demonstrated through use of coating calculations</p> <p>CAM is currently not applicable</p>
P001	0.72 lb PE/hr; 3.15 tpy	31-05	N	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified</p> <p>ET-calculations using AP42 emissiion factors at maximum capacity and the M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.</p> <p>CAM is currently not applicable</p>
P001	0.10 lb NOx/mmbtu	N	Y	N	Y	Y	N	Y	Y	N	Y	N	Y	N	<p>Basis-Consent decree</p> <p>OR- permittee required to install a selective catalytic reduction control device to continuously control Nox emissions to the specified restriction.</p> <p>CAM is applicable and CAM plan has been submitted.</p>
P001	9.6 lbs Nox/hr, 42.05 tpy	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR- permittee required to install a selective catalytic reduction control device to continuously control Nox emissions to the specified restriction.</p> <p>CAM is applicable and CAM plan has been submitted.</p>

P001	1.04 lbs OC/hr, 4.56 tpy	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified</p> <p>ET-AP42 emission factors adequate to show compliance</p> <p>CAM is currently not applicable</p>
P001	12.4 lbs CO/hr, 54.31 tpy	N	Y	N	y	y	n	n	y	n	y	n	y	n	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified</p> <p>CAM is currently not applicable</p>
P010	1.03 lbs PE/hr; 4.5 tpy	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified</p> <p>ET-calculations using AP42 emissiion factors at maximum capacity and the M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.</p> <p>CAM is currently not applicable</p>
P010	0.06 lb NOx/mmbtu	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR- permittee required to install a selective catalytic reduction control device to continuously control Nox emissions to the specified restriction.</p> <p>CAM is applicable and CAM plan has been submitted.</p>
P010	4.61 lbs Nox/hr, 20.18 tpy	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI.</p> <p>OR- permittee required to install a selective catalytic reduction control device to continuously control Nox emissions to the specified restriction.</p> <p>CAM is applicable and CAM plan has been submitted.</p>

P010	0.21 lb VOC/hr, 0.90 tpy	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI. OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified ET-AP42 emission factors adequate to show compliance CAM is currently not applicable
P010	4.45 lbs CO/hr, 19.49 tpy	N	Y	N	y	y	n	n	y	n	y	n	y	n	Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI. OR-unit restricted to combust only natural gas, monitoring, record keeping, reporting requirements specified CAM is currently not applicable
P010	3.99 tons ammonia/year	N	Y	N	N	N	N	N	N	N	N	N	N	N	Basis-OAC rule 3745-31-05 All terms and conditions have been transferred from the PTI. M, R, Rp, ET calculations based on PTE, therefore no monitoring, record keeping and reporting requirements necessary. CAM is currently not applicable.
P001 P010	CAM plan	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Basis-40 CFR Part 64

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.