

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Jay Industries (a.k.a. Jay Plastics and Crestline Paint)		
Premise Number	03 70 01 0058		
What makes this facility a Title V facility?	VOC, 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)	N/A		

## Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1, A.2, A.3, A.4, A.5	21-07 (G)(1)		OC emissions limitations for six insignificant emissions units, with associated monitoring, recordkeeping, reporting, and compliance determination provisions.
A.6		40 CFR 63.3880 et seq.	MACT Subpart Mmmm - Miscellaneous Metal Parts and Products Surface Coating (cross-reference to requirements in Attachment 1)
A.6		40 CFR 63.4480 et seq.	MACT Subpart Pppp - Plastic Parts Surface Coating (cross-reference to requirements in Attachment 2)

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.

<b>Part III (Requirements Within the State and Federally Enforceable Section)</b>															
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- )	O												
K101	1.1 lb VOC /hr, 4.81 ton /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
K101	3.5 lb VOC /gal of coating	21-09 (U)(1)(d)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material composition tracking. Monthly monitoring frequency per OAC 3745-21-09(B)(3)(f). ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.
P003 P004	3.8 lb NOx /hr, 16.6 ton /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P003 P004	1.0 lb CO /hr, 4.4 ton /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P003 P004	0.4 lb VOC /hr, 1.76 ton /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P003 P004	0.1 lb SO2 /hr, 0.44 ton /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005	2.6 lb NOx /hr, 11.3 ton /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.

EU(s)	Limitation	Basis	ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
P003 P004	0.1 lb PE /hr, 0.44 ton /yr	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE) M - Tracking for any day where a fuel other than natural gas was used. ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005	0.7 lb CO /hr, 3.1 ton /yr	31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005	0.26 lb VOC /hr, 1.3 ton /yr	31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005	0.06 lb SO2 /hr, 0.3 ton /yr	31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005	0.39 lb PE /hr, 1.7 ton /yr	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE) M - Tracking for any day where a fuel other than natural gas was used. ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P003 P004 P005	20% opacity	17-07 (A)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE and opacity) M - Tracking for any day where a fuel other than natural gas was used. ET - None normally required for opacity alone.
P005	0.062 lb PE /mmBtu	17-11 (B)(5)(b)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE) M - Tracking for any day where a fuel other than natural gas was used. ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
R003 R004 R005 R006 R008 R009 R010 R011	6.97 lb OC /hr* 5.97 lb OC /hr* 1.4 lb OC /hr 2.2 lb OC /hr 5.04 lb OC /hr 5.96 lb OC /hr 4.26 lb OC /hr 4.26 lb OC /hr	31-05	N	N	N	N	N	N	N	N	N	N	N	* includes clean-up OC emissions M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
R003 R004 R005 R006 R008 R009 R010 R011	30.5 ton OC/yr* 26.1 ton OC/yr* 6.0 ton OC /yr 9.64 ton OC /yr 22.1 ton OC /yr 26.1 ton OC /yr 18.7 ton OC /yr 18.7 ton OC/yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	* includes clean-up OC emissions M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
R101 R103 R105 R106 R107 R108 R109 R110 R111	0.84 lb OC /hr 5.34 lb OC /hr 1.41 lb OC /hr 2.29 lb OC /hr 1.34 lb OC /hr 1.05 lb OC /hr 0.27 lb OC /hr 1.0 lb OC /hr 3.33 lb OC /hr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
R101 R103 R105 R106 R107 R108 R109 R110 R111	3.68 ton OC /yr 23.4 ton OC /yr 6.18 ton OC /yr 10.0 ton OC /yr 5.87 ton OC /yr 4.60 ton OC /yr 1.18 ton OC /yr 4.38 ton OC/yr 14.6 ton OC /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
R005 R006 R008 R009 R010 R011	30.8 lb OC /mo, 0.18 ton /yr 31.2 lb OC /mo, 0.19 ton /yr 7.34 lb Oc /mo, 0.04 ton /yr 7.34 lb Oc /mo, 0.04 ton /yr 13.9 lb OC /mo, 0.08 ton /yr 13.9 lb OC /mo, 0.08 ton /yr			N	N	Y	N	N	Y	N	Y	N	N	N	All OC limits are for clean-up operations. M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination

EU(s)	Limitation	Basis	ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
R007	54.1 lb OC/day, 9.87 ton /yr *	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	* includes clean-up OC emissions M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
K101 R101 R103 R105 R106 R107 R108 R109 R110 R111	31.9 lb OC /mo, 0.19 ton /yr (each)	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	All OC limits are for clean-up operations. M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
K101 R003 R004 R101 R103 R105 R106 R107 R108 R109 R110 R111	0.551 lb PE /hr (each)	17-11 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Operational tracking of water wash system. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet practical. ET - None - per Ohio EPA Engineering Guide 16
R005 R006 R007 R008 R009 R010 R011	0.1 lb PE /hr, 0.44 ton yr 0.1 lb PE /hr, 0.44 ton yr 0.1 lb PE /hr, 0.44 ton yr 0.01 lb PE /hr, 0.04 ton yr 0.02 lb PE /hr, 0.09 ton yr 0.02 lb PE /hr, 0.09 ton yr 0.02 lb PE /hr, 0.09 ton yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Operational tracking of water wash system *. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet practical. ET - None - per Ohio EPA Engineering Guide 16  * dry filtration system, for R008

EU(s)	Limitation	Basis	ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
R010 R011	0% opacity	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M -Water wash system operational tracking provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone.
K101 R003 R004 R005 R006 R008 R009 R101 R103 R105 R106 R107 R108 R109 R110 R111	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M -Water wash* system operational tracking provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone.  * dry filtration system, for R008
R008 R009 R010 R011	90% control efficiency for particulate matter	31-05		N	N	N	N	N	N	N	N	N	N	N	The control efficiency of a dry filtration or water wash system properly operated in accordance with section A.II.2 is assumed to be at least 90 percent for PE. Therefore, it is not necessary to develop monitoring, record keeping or reporting requirements to ensure compliance with this control efficiency limitation.
P003 P004 P005	None	18-06		Y	N	N	N	N	N	N	N	N	N	N	This operation is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(B).
P003 P004 P005	See comments	23-06 21-08		N	N	N	N	N	N	N	N	N	N	N	The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13782.

EU(s)	Limitation	Basis	ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
P003 P004	See comments	17-11 (B)(5)(b)	N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P003 P004 P005	See comments	31-05	N	N	N	N	N	N	N	N	N	N	N	The requirements of this rule include compliance with the requirements of OAC rule 3745-17-07(A).
P005	See comments	17-11 (B)(5)(b)	N	N	N	N	N	N	N	N	N	N	N	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-11(B)(5)(b).
K101	See comments	31-05	N	N	N	N	N	N	N	N	N	N	N	The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-09(U)(1)(d).
R003 R004 R101 R103 R105 R106 R107 R108 R109 R110 R111	See comments	31-05	N	N	N	N	N	N	N	N	N	N	N	The requirements of this rule include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), and 3745-21-07(G).
R005 R006 R007 R008 R009 R010 R011	See comments	17-11 (B)(1)	N	N	N	N	N	N	N	N	N	N	N	The emissions limitation based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
R010 R011	See comments	17-07 (A)	N	N	N	N	N	N	N	N	N	N	N	The visible emissions limitation based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

EU(s)	Limitation	Basis	ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
R003 R004 R005 R006 R007 R008 R009 R010 R011 R101 R103 R105 R106 R107 R108 R109 R110 R111	see OR in comments	21-07 (G)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - cannot use photochemically-reactive materials. ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.

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.1.1 and A.1.2 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.