

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	Bulk Molding Compounds, Inc.
Premise Number	0387040001
What makes this facility a Title V facility?	PM, OC/VOC, HAPs (styrene)
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	<b>YES</b>
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.	<b>NO</b>
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)	P025 and P026 (PTI #03-13080, mod.), P027 and P028 (PTI #03-16038, mod.), P029 (PTI #03-17003), and P030 and P031 (PTI #03-17241)
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)	<b>N/A</b>
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)	<b>N/A</b>
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 (no PTI), P002 (no PTI), P011 (PTI #03-09519), P013 (PTI #03-09519), P015 (no PTI), P016 (no PTI), P017 (PTI #03-09519), P019 (no PTI), P020 (no PTI), P021 (no PTI), P022 (no PTI), P023 (no PTI), P025 and P026 (PTI #03-13080, mod.), P027 and P028 (PTI #03-16038, mod.), P029 (PTI #03-17003), and P030 and P031 (PTI #03-17241)

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1.		40 CFR Part 63, Subpart WWWW	States applicability of MACT Subpart WWWW (Reinforced Plastics Composites Production)
A.2., including A.2.a. through A.2.d.	77-07	40 CFR Part 63, Subpart WWWW	States insignificant emissions units with PTIs and MACT applicability (T001, T014, T015, T016)). A.2.a. through A.2.d. states the MACT requirements applicable to the these insignificant emissions units.
B.1.	77-07		States insignificant emissions units that are deminimis or exempt from permit requirements (Z012 through Z019).

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		N D	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P001, P020, P021	3.1 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

P001, P002, P011, P013, P019, P020, P021, P023	Visible PE from the stack shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
P001, P011, P013, P015, P016, P017, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031	none	21-07(G)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>ND - OAC rule 3745-21-07(G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).</p> <p>It should be noted that on February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC), and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).</p> <p><b>M, R, Rp &amp; ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.</b></p>
P001, P002, P011, P013, P019, P020, P021, P023	none	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	<p>ND - This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.</p> <p><b>M, R, Rp &amp; ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.</b></p>

P001, P002, P011, P013, P019, P020, P021, P023	none	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Pursuant to OAC rule 3745-17-07(B)(11), OAC rule OAC 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.  M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P001, P003, P011, P013, P020, P021, P023, P025, P027, P029, P030, P031	work practice standards for mixers at BMC facilities	N	40 CFR Part 63, Subpart WWWW	N	N	N	N	N	N	N	Y	N	N	N	[In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a mixer at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]  The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b) and shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Items #6, #7, and #8 - For all mixing or BMC manufacturing operations.  M & R - There are not monitoring and recordkeeping requirements in the MACT for mixing operations at existing BMC manufacturing facilities.
P017	work practice standards for cleaning operations at BMC facilities	N	40 CFR Part 63, Subpart WWWW	N	N	N	N	N	N	N	Y	N	N	N	ND - [In accordance with 40 CFR Part 63.5795(b) and 63.5935, this emissions unit is a cleaning operation at an existing BMC manufacturing facility, subject to the work practice standards specified in this section.]  The permittee shall comply with the applicable standards required for operations at existing facilities pursuant to 40 CFR Part 63, Subpart WWWW, as stated in 63.5805(b). Per this regulation, this emissions unit shall meet the requirements stated in Table 4 to Subpart WWWW of Part 63 - Work Practice Standards, Item #2 - For a new or existing cleaning operation.  M & R - There are not monitoring and recordkeeping requirements in the MACT for facility cleaning operations at existing BMC manufacturing facilities.

P001, P003, P011, P013, P017, P020, P021, P023, P025, P027, P029, P030, P031	applicablty as stated in Table 15 of WWWW	N	40 CFR Part 63, Subpart A (general provisions)	N	N	N	N	N	N	N	N	N	N	N	Table 15 to Subpart WWWW of 40 CFR Part 63 - Applicability of General Provisions to Subpart WWWW shows which parts of the General Provisions in 40 CFR 63.1 - 15 apply.  M, R, R, & T - not applicable
P002	3.7 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P011, P025, P027, P029, P030, P031	none	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P011	stack emissions: 0.30 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P011	stack emissions: 7.3 tons OC/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - Testing will be required with this renewal, to confirm the emissions factor of 0.25 lbs OC/batch used in recordkeeping.
P011	fugitive emissions: 1.50 lbs PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - visible emissions checks are sufficient to show compliance, and fugitive emissions are not a testable source.
P011	stack & fugitive emissions: 8.1 tons PE/year	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - As long as compliance with the hourly emissions rates of 0.03 lbs PE/hr (stack) and 1.5 lbs PE/hr (fugitive) is maintained, compliance with the annual emissions limitation shall be assumed.
P013	stack emissions: 0.30 lb PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	

P013	stack emissions: 7.3 tons OC/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - Testing will be required with this renewal, to confirm the emissions factor of 0.25 lbs OC/batch used in recordkeeping.
P013	fugitive emissions: 1.20 lbs PE/hr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - visible emissions checks are sufficient to show compliance, and fugitive emissions are not a testable source.
P013	stack & fugitive emissions: 6.5 tons PE/year	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - As long as compliance with the hourly emissions rates of 0.03 lbs PE/hr (stack) and 1.5 lbs PE/hr (fugitive) is maintained, compliance with the annual emissions limitation shall be assumed.
P016	1.66 lbs OC/hr; 7.3 tons OC/yr	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	ET - Emissions estimates are based on the conservative assumption that the hourly OC emissions rate from the extruder is equal to the daily OC emission rate of the Littleford Mixer, divided by 24. Therefore, compliance can be assumed to be maintained based upon the recordkeeping specified in A.III.10., for the Littleford Mixer (P011).
P017	8.5 tons OC/yr	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - recordkeeping is sufficient to show compliance and cleaning operations are not a testable source.
P019	7.0 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P023	4.1 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P025, P027, P029, P030, P031	none	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND- The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P025	0.15 lbs PE/hour, 0.66 ton PE/year	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P025	1.88 lbs OC/hour, 7.3 tons OC/year	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - Testing requirement comes from the PTI, and the facility is out of compliance (have not tested).

P025	0% opacity, as a 6-minute average	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET - If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
P026	3.30 lbs OC/hour, 14.45 tons OC/year	N	31-05 (A)(3)	N	N	N	N	N	N	N	Y	N	Y	N	M & R - Not established because OC emissions are fugitive, and assumed to be less than to OC emissions of the associated mixer (i.e. conservative estimate of PTE). Testing requirement comes from the PTI, and the facility is out of compliance (have not tested).
P027	0.02 grain PM10/dscf, 1.49 tons PM10/year	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P027	1.67 lbs OC/hour, 7.30 tons OC/year	N	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	Y	N	M & R - Hourly emissions rate is based on the 21-07 limit of 40 lbs/day (divided by 24 hours/day), and is assumed to be the PTE of the emissions unit. This permit, however, will require testing to confirm OC emissions.
P028	1.67 lbs OC/hour; 7.30 tons OC/year	N	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	Y	N	M & R - Not established because OC emissions are fugitive, and assumed to be less than to OC emissions of the associated mixer (i.e. conservative estimate of PTE).
P029	0.02 grain PM10 per dscf, 1.49 tons PM10 per year	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	
P029	7.30 tons OC per year	N	31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - Emissions limit is based on 21-07. Testing is required to confirm emissions factor used in recordkeeping.
P030, P031	0.02 grains PM10 per dscf, 1.49 tons PM10/year	N	31-02 (A)(2)	N	N	Y	N	N	Y	N	Y	N	Y	N	The permittee has requested voluntary allowable emission limitations of 0.02 grains PM10/dscf and 1.49 tons PM10/year. The short-term (gr/dscf) and long-term (tons/year) emission limitations for PM10 are being established as practically and legally enforceable requirements representing the potential to emit based on the use of a baghouse meeting a maximum outlet concentration of 0.02 gr PM10/dscf.
P030, P031	none	ORC 3704.03 (T)(4)	N	Y	N	N	N	N	N	N	N	N	Y	N	ET - ????

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.