

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Alcoa Building Products, Inc.
Premise Number	0575010103
What makes this facility a Title V facility?	This facility is a major facility for volatile organic compound (VOC) and triggers MACT thresholds for HAP's
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)	None
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)	None
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)	None
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)	<p>PTI 05-14417, the facility plans to replaced their regenerative thermal incinerator (with a thermal oxidizer), install new ovens, and replace the spray nozzles on K002. This change will increase the potential emissions from emissions unit K002. In PTI 05-14417, new emission limitations, record keeping, reporting , and testing requirements were established.</p> <p>CAM was also established in the Title V terms for K001 and K002. The company committed to comply with MACT SSSS record keeping requirements for thermal oxidizers for CAM for VOC. According to 40 CFR Part 64.4(B)(4), this is sufficient to satisfy the record keeping requirements of CAM.</p>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.	31-03		The following insignificant emissions units are located at this facility: B001, Boiler #1; B002, Boiler #2; B003, Boiler #3; B004, Boiler #4; B005, Boiler #5; B006, Boiler #6; B007, Boiler #7; B008, Boiler #8; and P020, Diesel Backup Water Pump.
A.1.	77-01(U)		The following insignificant emissions units are located at this facility: B011, Trim Sheet Area AMU; B012, Bldg. 1 AMU #1; B013, Bldg. 1 AMU #2; B014, Bldg. 1 AMU #3; B015, Bldg. 1 AMU #4; K010, Small Parts Spray Booth; P011, EZ Mix Custom Color Lab; T009, Cylindrical Tank #1; T010, Cylindrical Tank #2; T011, Cylindrical Tank #3; and T012, Cylindrical Tank #4.

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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
B009	0.020 lbs PE/MMBTU	17-10(B)(1)			y				y		y		y		Limited to use of natural gas
	20% opacity per 6 minute average	17-07(A)											y		
B010	0.020 lbs PE/MMBTU	17-10(B)(1)			y				y		y		y		Limited to use of natural gas
	20% opacity per 6 minute average	17-07(A)											y		

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745- )	Other													
F001	No visible emissions except 6 mins. per 60 min. period.	31-05(A)(3)			y	y							y			
K001	0.020 lbs PE/MMBTU	17-10(B)(1)			y				y		y		y		Limited to use of natural gas	
	20% opacity per 6 minute average	17-07(A)											y			
	When the capture and control system is not employed, VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or 4.0 lbs/gallon of solids when using the thermal oxidizer.  or The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.	OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)			y	y				y		y		y		
	Compliance Option SSSSe:  Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period.		40 CFR Part 63, Subpart SSSS			y	y			y		y		y		

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
K001	Compliance Option SSSSc: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).		40 CFR Part 63, Subpart SSSS													
K002	Emissions from natural gas and/or propane combustion in the air make-up units, oven burners, pretreat oven burners, and thermal oxidizer shall not exceed 3.27 lbs NOx/hr and 5.14 lbs CO/hr.  Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities, shall not exceed 425.51 tons per rolling 12-month period.  Carbon monoxide (CO) emissions from from this emissions unit, shall not exceed 27.71 tons per rolling 12-month period, including the CO generated by the combustion of the VOC's generated in the coating operations and combusted in the thermal incinerator.	31-05(A)(3)			y	y			y		y		y			

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
K002	<p>Nitrogen Oxide (NOX) emissions from this emissions unit, shall not exceed 75.46 tons per rolling 12-month period, including the NOx generated by the combustion of the VOC's generated in the coating operations and combusted in the thermal incinerator.</p> <p>This emissions unit shall be equipped with a thermal oxidizer.</p>	31-05(A)(3)			y	y			y		y		y			
	<p>When the capture and control system is not employed, VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or 4.0 lbs/gallon of solids when using the thermal oxidizer. Or</p> <p>The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.</p>	21-09(E) and 21-09(B)(6)			y	y			y		y		y			

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
K002	<p>Compliance Option TTn: VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calendar month without the use of the thermal oxidizer</p> <p>Compliance Option TTc: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer.</p> <p>Compliance Option TTce: VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOC's applied for each calendar month.</p> <p>Compliance Option TTi: VOC emissions shall not exceed a value between 0.14 (or a 90-percent emission reduction) and 0.28 kg/liter (between 1.17 and 2.34 lb/gal) of coating solids applied for each calendar month with intermittent use of the thermal oxidizer.</p>		40 CFR Part 60, Subpart TT			y			y		y		y			
	<p>Compliance Option SSSSe: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period.</p>		40 CFR Part 63, Subpart SSSS			y			y		y		y			

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K002	Compliance Option SSSScce:  Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).		40 CFR Part 63, Subpart SSSS			y			y		y		y		
	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and SO2 emissions from this emissions unit since the potential emissions are less than ten tons per year.	31-05(A)(3)(b)											y		
	Particulate emissions (PE) shall not exceed 0.020 pounds per million BTU of actual heat input.	17-10(B)(1)											y		
	The visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average	17-07(A)											y		

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745- )	Other													
P010	<p>This emissions unit is located in Shelby County. Shelby County is not a listed "Priority I" county under OAC rule 3745-21-06. Based on the application, this emissions unit was installed and has not been modified since January 1965. Under OAC rule 3745-31-01(UUU), a "New source", is an emissions unit that was installed and/or modified after January 1, 1974.</p> <p>Since this emissions unit is not in a "Priority I" county and this emissions unit is not a "new stationary source", the requirements of OAC rule 3745-21-07 are not applicable.</p>	21-07(A)(1)														

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.