

Statement of Basis For Title V Permit

Part I - General	
Company Name	American Trim L.L.C.
Premise Number	0575010106
What makes this facility a Title V facility?	Organic Compound (OC), as part of this Title V renewal the facility has requested synthetic minor limits for HAPs.
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		Comments
	SIP (3745-)	Other	
A.2.	31-05(C)		The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all non-insignificant emissions units at this facility shall not exceed 9.0 TPY* for any single HAP and 22.5 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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												
Entire facility	shall not exceed 9.0 TPY* for any single HAP and 22.5 TPY* for any combination of HAPs. based on a rolling, 12-month summation.	-31-05(C)				y			y		y				Synthetic minor to avoid MACT Miscellaneous Metall Coating Requirements

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K005 (same for K006, K008, and K009)	(VOC) content of the coatings shall not exceed 5.35 lbs/gal.	-31- 05(A)(3) BAT			y				y			y	y		
	coating usage shall not exceed 10 gals. /day	21-09(U) (2)(e)(iii)			y	y			y			y	y		
	VOC emissions, form K005 through K009, shall not exceed 14.87 tons per rolling, 12-month period.	-31- 05(C)			y	y			y			y	y		Synthetic minor to avoid PSD thresholds
	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17- 10(B)												y	
	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average	OAC rule 3745-17-0 7(A)												y	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K007	(VOC) content of the coatings shall not exceed 5.35 lbs/gal.	-31-05(A)(3) BAT			y	y			y			y	y		
	coating usage shall not exceed 10 gals. /day	21-09(U) (2)(e)(iii)			y	y			y			y	y		
	VOC emissions, form K005 through K009, shall not exceed 14.87 tons per rolling, 12-month period.	-31-05(C)			y	y			y			y	y		Synthetic minor to avoid PSD thresholds
K022	(VOC) content of the coatings shall not exceed 5.36 lbs/gal.	-31-05(A)(3) BAT			y	y			y			y	y		
	VOC shall not exceed 18.895 tons VOC per rolling 12 month period.	-31-05(C)			y	y			y			y	y		Synthetic minor to avoid PSD thresholds

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K022	5.36 lbs VOC/gallon, as applied minus water and exempt solvents.	3745-21-09 (U)(2)(f)(i)			y	y			y		y		y		<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average.	-17-07(A)											y		
	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17-10(B)											y		
K033	(VOC) content of the coatings shall not exceed 5.36 lbs/gal.	-31-05(A)(3) BAT			y	y			y			y	y		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K033	VOC shall not exceed 18.895 tons VOC per rolling 12 month period.	-31-05(C)			y	y			y			y	y		Synthetic minor to avoid PSD thresholds
	5.36 lbs VOC/gallon, as applied minus water and exempt solvents.	3745-21-09 (U)(2)(f)(i)			y	y			y		y		y		<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17-10(B)											y		
	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average.	-17-07(A)											y		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K045	(VOC) content of the coatings shall not exceed 5.36 lbs/gal.	-31-05(A)(3) BAT			y	y			y			y	y		
	VOC shall not exceed 18.874 tons VOC per rolling 12 month period.	-31-05(C)			y	y			y			y	y		Synthetic minor to avoid PSD thresholds
K045	5.36 lbs VOC/gallon, as applied minus water and exempt solvents.	3745-21-09 (U)(2)(f)(i)			y	y			y		y		y		<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average.	-17-07(A)											y		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K045	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17-10(B)											y		
	VOC content of cleanup/pan solvent shall not exceed 7.76 pounds per gallon.	-31-05(A)(3)			y	y			y		y				
K046	(VOC) content of replenishment material used shall not exceed 0.19 lb/gallon, as applied	-31-05(A)(3)			y	y			y		y				
	VOC content of cleanup materials employed on this emission unit shall not exceed 0.68 lb /lb cleanup material	-31-05(A)(3)			y	y			y		y				

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K046	VOC content of non-compliant extreme performance coatings shall not exceed 5.36 lbs /gallon, as applied minus water and exempt solvents.	21-09 (U)(2)(f)(i)			y	y			y		y				<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	The maximum replenishment material usage for this emissions unit shall not exceed 100,000 gallons per rolling 12-month period.	-31-05(C)			y	y			y		y				Synthetic minor to avoid PSD thresholds
	The maximum cleanup material usage for this emissions unit shall not exceed 150 gallons per rolling 12-month period.	-31-05(C)			y	y			y		y				Synthetic minor to avoid PSD thresholds

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K046	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average.	-17-07(A)											y		
	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17-10(B)											y		
K048	The VOC content for cleanup/pan sol. shall not exceed 7.76lbs/gal.	31-05(A)(3)			y	y			y		y				
	VOC content of coatings shall not exceed 5.21 lbs VOC/gal., as applied minus water and exempt solvents	31-05(A)(3)			y	y			y		y				<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	use of natural gas and propane only in drying ovens	31-05(A)(3)				y			y		y				

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K048	VOC emissions shall not exceed 27.8 tons per rolling 12-month period.	31-05(A)(3)				y			y		y		y		
	VOC content coatings shall not exceed 5.21 lbs VOC/gallon, as applied minus water and exempt solvents.	21-09(U)(2)(f)(i)			y	y			y		y				<p>This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.</p> <p>Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.</p>
	0.02 lb PE per mmBtu for the drying oven	OAC rule 3745-17-10(B)												y	
	Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average.	-17-07(A)												y	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P081 through P106	VOC content of oils shall not exceed 6.76 lbs/gal.	31-05(A)(3)			y	y			y		y				
	VOC emissions from P081 through P106 shall not exceed 48.02 tons as a rolling, 12-month	31-05(C)				y			y		y		y		<p>Synthetic minor to avoid PSD thresholds</p> <p>VOC emissions from P081 through P106 shall not exceed 48.02 tons per rolling 12-mth period. Emissions calculated according to the following:</p> <p>Sum of all (Gi)(Vi) ÷ 2000 lbs/ton</p> <p>where:</p> <p>Gi = usage of lubricant i in gallons for the rolling 12-month period Vi = VOC content of lubricant i in lbs of VOC per gal, subject to the following limitation: Vi ≤ 6.76 lbs VOC/gallon i = total number of unique lubricants used on emission units P081 through P106 combined.</p>
	The liquid organics employed not be exposed to temp. exceeding 220 degrees F, and the boiling points not exceed 200 degrees F at 0.5 mill. Mg absolute press.	21-07(G)(9)(e)			y	y				y		y			

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P107- P114, P117- P140	VOC content of lubricating oils shall not exceed 5.75 lbs. per gal.	31-05(A)(3)			y	y			y		y				
	The VOC emissions not exceed 10.5 tons as a rolling, 12-month summation for emissions units P107 through P114, and P117 through P140.	31-05(C)				y			y		y		y		<p>Synthetic minor to avoid PSD thresholds</p> <p>The VOC emissions not exceed 10.5 tons as a rolling, 12-month P107 - P114, and P117 - P140.</p> <p>VOC emissions shall be calculated according to the following equation:</p> <p>AER = [Sum of all(Vi)(Gi)] ÷ 2000 lbs/Ton</p> <p>where: AER= Annual Emission Rate, in tons per 12-month rolling period; Vi = VOC content in lbs per gal of lubricating oil,; and Gi = Gallons used of each lubricating oil for the rolling 12 month period.</p>
	The liquid organics employed not be exposed to temp. exceeding 220 degrees F, and the boiling points not exceed 200 degrees F at 0.5 mill. Mg absolute press.	21-07(G)(9)(e)			y	y			y		y				

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P115 and P116	VOC content of the cleaning solution not exceed 8.5 lbs/gal.	31-05(A)(3)													
	VOC emissions from P115 and P116 not exceed 40.0 tons per rolling 12-month period.	31-05(C)													<p>Synthetic minor to avoid PSD thresholds</p> <p>VOC emissions from P115 and P116 not exceed 40.0 tons per rolling 12-month period based on the following:</p> $AER = \frac{[(\text{Sum of all } (V_i)(G_i)] \div 2000 \text{ lbs/Ton} - [(R_w)(P_o)(VOC_o) \div 2000 \text{ lbs/Ton}]$ <p>where;</p> <p>AER= Annual Emission Rate, in tons per 12-month rolling period; V_i =VOC content in lbs per gal; G_i = Gal. for the rolling 12 month period; R_w = ratio of solvent used on P115 and P116 to (total solvent used - the solvent used on Emission unit K045); P_o = total gal. recovered sol. less the gal. of solvent recovered from K045; and VOC_o =VOC content of recovered solvents in lbs/gal.</p>

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.