Statement of Basis For Title V Permit

Company Name	DAP Inc.
Premise Number	08-55-13-0356
Number of Non-insignificant Emissions Units	28
What makes this facility a Title V facility?	VOC, HAPS
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Part II.A.1.	N	Y	Proposed Standards (40 CFR 63 Subpart HHHHH), Miscellaneous Organic NESHAP
Part II.A.2.	N	Y	Proposed Standards (40 CFR 63 Subpart HHHHH), Miscellaneous Organic NESHAP
Part II.A.3.	35-07	N	Synthetic Minor limitations on HAP emissions from all emissions units at the facility, 9.9 TPY for any individual HAP and 24.9 TPY fall HAPs combined, on a 12-month rolling summation to avoid MACT requirements.
Part II.A.4.	77-07	N	Monthly recordkeeping requirements for facility wide 12-month rolling summation of HAPs emissions.
Part II.A.5.	77-07	N	Quarterly deviation reporting for facility wide 12-month rolling summation of HAPs emissions.
Part II.A.6.	77-07	N	Annual HAPs Emissions reporting.

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.

C If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)										
EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P005	2.31 lbs/hr OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	17.28 lbs/day OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	3.20 TPY OC	31-05(A)(3)	N	N	Y	Y	N	N	N	Rp: No reporting requirement for the TPY allowable is being required because allowable is less than 10 TPY
P012	1.28 lbs/hr OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	30.72 lbs/day OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	5.60 TPY OC	31-05(A)(3)	N	N	Y	Y	N	N	N	Rp: No reporting requirement for the TPY allowable is being required because allowable is less than 10 TPY
P014, P015, & P016	0.53 lbs/hr OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	OR: Pressure drop across the fabric filter shall be maintained at not less than 0.5 inch of water
	6.37 lbs/day OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	M: Operate and maintain equipment to monitor the pressure drop across the fabric filter while the emissions unit is in operation R.: Daily records of pressure drop across fabric filter Rp: Quarterly deviation reporting of pressure drop across fabric filter
	1.16 TPY OC	31-05(A)(3)	N	N	Y	Y	N	N	N	
	0.069 lb/hr PE	31-05(A)(3)	N	Y	Y	Y	Y	N	N	Rp: No reporting requirement for the TPY allowable is being required because allowable is less than 10 TPY
	5% opacity	31-05(A)(3)	N	N	N	N	N	N	N	ET: No emissions testing is necessary

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
P020 & P021	38.09 lbs/day OC	31-05(A)(3)	N	Y	Y	Y	Y	N	N	OR: The average temperature of the exhaust gases from the condensers, for any 3-hr block of time, shall not be greater than 62 degrees F. Methylene chloride formulations shall not be processed in this emissions unit. M: Calculate emissions from every batch, operate and maintain continuous temperature monitor for exhaust from condensers. R: Daily records of average temperature of exhaust gases for each 3-hr time block and log of control equipment downtime. Rp: Quarterly deviation reports for exhaust temperatures from the condenser, and quarterly summaries of control equipment downtime. ET: Emissions testing is not possible due to low intermittent air flow, and heavily saturated nature of the gas stream. Misc: Temperature restrictions and removal efficiency of the condensers is based on a design evaluation conducted according to equations 40 CFR 63.1257(d).
	2.87 TPY OC	31-05(A)(3)	N	Y	Y	Y	Y	N	N	
P022	30.4 lbs/day OC	31-05(A)(3)	N	Y	Y	Y	Y	N	Y	OR: The average temperature of the exhaust gases from the condenser, for any 3-hr block of time, shall not be greater than 57 degrees F. Methylene chloride formulations shall not be processed in this emissions unit. M: Calculate emissions from every batch, operate and maintain continuous temperature monitor for exhaust from condensers. R: Daily records of average temperature of exhaust gases for each 3-hr time block and log of control equipment downtime Rp: Quarterly deviation reports for exhaust temperatures from the condenser, and quarterly summaries of control equipment downtime. ET: Emissions testing is not possible due to low intermittent air flow, and heavily saturated nature of the gas stream. Misc: Temperature restrictions and removal efficiency of the condensers is based on a design evaluation conducted according to equations 40 CFR 63.1257(d).
	1.69 TPY OC	31-05(A)(3)	N	Y	Y	Y	Y	N	N	
P023	30.4 lbs/day OC	31-05(A)(3)	N	Y	Y	Y	Y	N	Y	OR: The average temperature of the exhaust gases from the primary condenser, for any 3-hr block of time, shall not be than 57 degrees F. The average temperature of the exhaust gases from the secondary condenser, for any 3-hr block of time, shall not be greater than 23 degrees F when processing methylene chloride formulations. A new 180 lb activated carbon canister shall be installed prior to processing methylene chloride cements. M: Calculate emissions from every batch, operate and maintain continuous temperature monitor for exhaust from condensers. R: Daily records of average temperature of exhaust gases for each 3-hr time block and log of control equipment downtime Rp: Quarterly deviation reports for exhaust temperatures from condensers, methylene chloride batches when carbon canisters were not in use and quarterly summaries of control equipment downtime. ET: Emissions testing is not possible due to low intermittent air flow, and heavily saturated nature of the gas stream. Misc: Temperature restrictions and removal efficiency of the condensers is based on a design evaluation conducted according to equations 40 CFR 63.1257(d). Removal efficiency of carbon canister is based on manufacturers specifications.
	1.69 TPY OC	31-05(A)(3)	N	Y	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
P024, P025 P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, &P036	36.0 lbs/day OC	31-05(A)(3)	N	Y	Y	Y	Y	Y	Y	OR: The average temperature of the exhaust gases from the condenser, for any 3-hr block of time when material is transferred to the tanks, shall not be greater than 23 degrees F when processing methylene chloride formulations and 36.5 degrees F when processing non-methylene chloride formulations. Methylene chloride formulations shall only be processed in two tanks at any one time. M: Operate and maintain continuous temperature monitor for exhaust gas from condensers. R: Daily emissions calculations, records of average temperature of exhaust gases for each 3-hr time block and log of control equipment downtime. Rp: Quarterly deviation reports for exhaust temperatures from the condenser, quarterly summaries of control equipment downtime., days in which methylene chloride was processed in more than two WIP tanks. ET: Emissions testing is not possible due to low intermittent air flow, and heavily saturated nature of the gas stream. Misc: 75% removal efficiency is based on temperature limits of 40 CFR 63, Subpart HHHHH.
	6.5 TPY OC	31-05(A)(3)	N	Y	Y	Y	Y	N	N	
	311.2 lb/day and 56.79 TPY OC combined emissions for P024-P036	31-05(A)(3)	N	Y	Y	Y	Y	N	N	
P041	5.7 lbs/hr and 62.5 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	5.7 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	11.40 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
P042	4.8 lbs/hr and 62.5 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	4.8 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	11.40 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	
P043	4.8 lbs/hr and 115.72 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	4.8 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	21.16 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
P044	5.4 lbs/hr and 115.9 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	5.4 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	21.15 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	
P045	2.84 lbs/hr and 69.62 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	2.84 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	12.7 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
P046	5.16 lbs/hr and 72.54 lbs/day OC on any day that non-PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET: No emissions testing is necessary
	5.16 lbs/hr and 40 lbs/day OC on any day that PRMs are employed	31-05(A)(3)	N	N	Y	Y	Y	N	N	
	13.24 TPY OC	31-05(A)(3)	N	N	Y	Y	Y	N	N	

EU = emissions unit id
OR = operational restriction
M = monitoring requirements
R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - 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.

  - 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. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

    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 comments. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be provided:

    1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the "Miscellaneous Requirements" section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an "N" is noted in the "OR" column or in the "Misc" column.

C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.