

Statement of Basis For Title V Permit

Part I - General	
Company Name	Troy Laminating and Coating, Inc.
Premise Number	08-55-140-077
What makes this facility a Title V facility?	Individual and combined organic HAP, VOC
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)	<p>One new emissions unit (K010) has been added to the permit. Emissions units K001, K003, P011 and the carbon adsorption control system have been shut down and removed from the permit. Emissions units K002 has been disconnected from the thermal oxidizer and carbon adsorption system and are now permitted to only employ VOC compliant coatings. Emissions units K005 and K007 have been disconnected from the carbon adsorption control system and are now permitted to use the thermal incinerator control or VOC compliant coatings. Terms addressing NESHAP compliance for emissions units K002, K004, K005, K007 and K010(Paper and Other Web Coating operations; 40 CFR 6, Subpart JJJJ); including additional terms to K004 and K010(Printing and Publishing Industry; 40CFR 63, Subpart KK) on these emissions units in Parts II and III. The NESHAP General Provisions and exempt natural gas fired boilers (Industrial and Commercial Boilers; 40 CFR 63, Subpart DDDDD) have been addressed in Part II. The pressure differential requirements for emissions unit P002 have been moved from operational restriction to the monitoring and record keeping requirements. CAM was added for units K005 and K007.</p>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1	N	40 CFR 63	40 CFR 63, Subpart JJJJ Emissions Units K002, K005, K005, K007 and K010 comply with the requirements of this rule by using a combination of compliant coatings and a thermal oxidizer. [40 CFR 63.3370(a)(6)]
A.2	N	40 CFR 63	40 CFR 63, Subpart A as defined in Table 2 of 40 CFR Part 63, Subpart JJJJ
A.3	N	40 CFR 63	40 CFR 63, Subpart KK, Emissions units K004 and K010 are equipped with flexographic printing stations, provided that the weight percent of coatings employed in flexographic printing never exceed five weight percent total coating use at the facility on a monthly basis, these emissions units are subject only to the record keeping requirements of 40 CFR 63.829(f). [40 CFR 63.821(a)(2)(ii)(A)]
A.4	N	40 CFR 63	40 CFR 63, Subpart DDDDD, All of the boilers in use at this facility are small (< 10 MMBtu) gaseous fuel fired boilers that are affected units but do not have to meet any requirements of the rule. [40 CFR 63.7506(c)(3)]
A.5	31-05	40 CFR 51, Appendix S	Facility wide limit of 495 tons VOC per year to maintain ozone NAAQS attainment.
A.6	17, 21 and 31-05(A)(3)	N	Insignificant emissions units that have applicable requirements in a permit to install or OAC chapters 3745-17, 3745-18 or 3745-21.
B.1	N	Y	List of de minimis emissions units.

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												
K002 K004 K005 K010	2.9 lbs VOC/gallon of coating applied, excluding water and exempt solvents	21-09 (F)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - When requested Method 24 for coating VOC content
K004 K010	148 tons per year flexographic printing ink	21-09 (Y)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Combined flexographic printing ink usage limitation to avoid VOC content restrictions.
K005	2,750 pounds per day and 97.0 tons per year VOC	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K005	Overall VOC emissions reduction of 81% and minimum 90% destruction by weight	21-09 (B)(6)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K007	72.2 pounds per hour and 77.9 tons per year VOC	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K007	1.0 pound VOC per gallon of coating applied, excluding water and exempt solvents	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 86% by weight VOC emissions reduction, VOC usage shall not exceed 81,146 pounds thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K010	VOC emissions shall not exceed 15.0 tons per year as a rolling 12-month summation	31-05 (C)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - VOC usage shall not exceed 30,000 pounds as a rolling 12-month summation. ET - When requested Method 24 for coating VOC content.
K002 K004 K005 K007 K010	The HAP content of the coating applied shall not exceed 0.2 kg HAP per kilogram of coating solids as a monthly average.	N	40 CFR 63. 3320 (b)(3)	N	Y	M	N	N	Y	N	Y	N	Y	N	OR - combination of "as applied compliant coatings" and "add-on controls", thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency and 311 for organic HAP content.
K005 K007	Compliance Assurance Monitoring	N	40 CFR Part 64	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - compliance with minimum temperature limitation for thermal incinerator and pressure differential for coating station enclosures. M - Includes continuous temperature monitoring fro RTO and daily inspection of coating station enclosures.
P002	Particulate emissions (PE) shall not exceed 2.39 lbs/hour	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - baghouse pressure differential shall be maintained within 2-6 inches water. ET - when requested pursuant to OAC rule 3745-17-03(B)(10).
P002	Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day.	21-07 (G)(2)	N	Y	N	Y	N	N	Y	N	Y	N	N	N	ND - the 8 lbs OC/hour emissions limitation shall exceeds the potential to emit for this emissions unit.
P002	Visible PE shall not exceed 20% opacity as a sis minute average.	17-07 (A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - baghouse pressure differential shall be maintained within 2-6 inches water. ET - when requested pursuant to OAC rule 3745-17-03(B)(10).
P013	OC emissions shall not exceed 1.0 lb/hour, 24 lbs/day and 4.38 tons per year.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	The 1.0 lb/hour and 24.0 lbs/day emissions limitation reflect the potential to emit for this emissions unit, therefore, record keeping and reporting requirements for these limits are not required. The emissions limitations established according to this rule are more stringent than the requirements established according to OAC rule 3745-21-07(G)(2).
P014	OC emissions shall not exceed 4212 lbs/day and 1.46 tons per year.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance. OR - coatings mixed shall not exceed 1,640 gallons per day and 113,890 gallons per year.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P014	Overall OC emissions shall be reduced by a minimum of 92%.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance. ET - Compliance was demonstrated during a performance test on May 11, 2006 with an overall control efficiency of 95.9%.

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.