

Statement of Basis For Title V Permit

Company Name	Spinnaker Coating, Inc.	
Premise Number	0855140083	
Number of Non-insignificant Emissions Units	5	
What makes this facility a Title V facility?	VOCs and 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	
n/a			

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K002, K003, and K006	less than 2.9 lbs VOC/gal of coating, excluding water and exempt solvents	21-09 (F)	N	Y	Y	Y	Y	N	N	OR: The permittee is restricted to the use of coatings with a VOC content of less than or equal to 2.9 lbs VOC/gallon, excluding water and exempt solvents M: The permittee shall monitor the VOC content of each coating material employed. R: The permittee shall maintain records of the VOC content of each coating employed. Rp: The permittee shall submit deviation reports when a coating with a VOC content greater than 2.9 lbs VOC/gallon, excluding water and exempt solvents is employed in this emissions unit. ET: No emissions testing is necessary to demonstrate compliance. Compliance is based upon record keeping and USEPA Method 24. M: There are no miscellaneous requirements.
K004 and K010	40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink	21-09 (Y)(1)(a)	N	Y	Y	Y	Y	N	N	OR: The permittee is restricted to the use of coatings and inks on the flexographic printers with less than 40% VOC by volume of the coating and/or ink, excluding water, or up to 25% VOC by volume of the volatile matter, excluding water. M: The permittee shall monitor the VOC content of the inks employed on the printing station. R: The permittee shall maintain records of the VOC content of the inks employed, in percent by volume of the ink, and in percent by volume of the volatile matter in the ink. Rp: The permittee shall submit records that identify any exceedances of the VOC content limitations for the ink. ET: No emissions testing is necessary to demonstrate compliance with this emissions limit. Compliance shall be based upon record keeping and USEPA Method 24 and 24A. M: There are no miscellaneous requirements.
K004 and K010	400 kg organic HAP employed per month, on the flexographic printing station	N/A	40 CFR Part 63 Subpart KK	Y	Y	Y	Y	N	N	OR: The permittee is restricted to the use of a maximum of 400 kg organic HAP each month on wide web flexographic printing presses on this emissions unit. M: The permittee shall monitor the total volume of each material and the organic HAP content of each material employed in this emissions unit on wide web flexographic printing presses. R: The permittee shall maintain monthly records of the total volume and organic HAP content of each material employed. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the monthly organic HAP usage. ET: No emissions testing is necessary to demonstrate compliance with this emissions limit. Compliance shall be based upon record keeping. M: There are no miscellaneous requirements.

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