

Statement of Basis For Title V Permit

| Part I - General | |
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| Company Name | Mullins Rubber Product Inc. |
| Premise Number | 08-57-77-0747 |
| What makes this facility a Title V facility? | Hazardous Air Pollutants (HAPs) |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)? | Y |
| 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. | N |
| 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) | PTI 08-04782 was issued on 12/19/2006 to permit an increase in VOC emissions(emissions unit K001) and to include the requirements of 40 CFR Part 63, Subparts M MMM and P PPP. |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|--------------------|---|---|
| Term and Condition (paragraph) | Basis | | <u>Comments</u> |
| | SIP (3745-) | Other | |
| A.1. | | 40 CFR Part 63, Subpar t A | The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in of Subpart A of 40 CFR Part 63 (General Provisions) in accordance with 40 CFR Parts 63.1 - 63.16. |
| A.2. | | 40 CFR Part 63, Subpar t MMM M | The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in of Subpart MMMM of 40 CFR Part 63 (Miscellaneous Metal Parts and Products) in accordance with 40 CFR Parts 63.3880 - 63.3981. |
| A.3. | | 40 CFR Part 63, Subpar t PPPP | The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in of Subpart PPPP of 40 CFR Part 63 (Plastic Parts and Products) in accordance with 40 CFR Parts 63.4480 - 63.4581. |

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 | O R | M | St | ENF | R | St | Rp | St | ET | Misc | <u>Comments</u> |
|-------|--|--------------------|-------|----|--------|---|----|-----|---|----|----|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | | | | | | |
| K001 | On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. | 21-07(G)(2) | N | N | N | Y | N | N | Y | N | Y | N | N | N | ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. |

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|---|---------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|--|
| <p>On the days when coating metal parts, the maximum daily coating usage shall not exceed 8 gallons of coating. If this usage limit is exceeded then OAC rule 3745-21-09(U)(1) will apply to this line.</p> | <p>21-09-(U)(2)(e)(i)</p> | <p>N</p> | <p>N</p> | <p>N</p> | <p>Y</p> | <p>N</p> | <p>N</p> | <p>Y</p> | <p>N</p> | <p>Y</p> | <p>N</p> | <p>N</p> | <p>N</p> | <p>N</p> | <p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p> |
| <p>The visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.</p> | <p>17-07(A)(1)</p> | <p>N</p> | <p>The filtration system operational restriction, monitoring, record keeping and reporting requirements are sufficient to ensure compliance.</p> |

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|---------------|--|-------------------|---------------------------|---|---|---|---|---|---|---|---|---|---|---|--|
| | The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr | 17-11(B)(1) | | N | Y | Y | N | N | Y | N | Y | N | N | N | OR- The permittee shall operate the dry filtration system for the control of particulate emissions whenever the paint spraying application associated with this emissions unit is in operation. The filtration system operational restriction, monitoring, record keeping and reporting requirements are sufficient to ensure compliance. |
| | 11.76 tons VOC/yr | N | PTI 08-0478 2 | N | N | Y | N | N | Y | N | Y | N | N | N | ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. |
| | 2.41 tons PE/yr | N | PTI 08-0478 2 | N | N | N | N | N | N | N | N | N | N | N | The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit. |
| L001 and L002 | control combination Table 2, option 6 (freeboard refrigeration device, reduced room draft and freeboard ratio 1.0) | N | 40 CFR Part 63, Subpart T | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - The permittee shall meet all of the required work and operational practices. ET - Compliance shall be demonstrated through monitoring, record keeping and reporting requirements. Emission testing is not required. |
| | 21.0 tons VOC/yr combined | N | PTI 08-0435 2 | N | N | Y | N | N | Y | N | Y | N | N | N | ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials |
| R001 | 8 gallon maximum daily coating usage | 21-09(U)(2)(e)(i) | N | N | N | Y | N | N | Y | N | Y | N | N | N | ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials |

- 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.