

Statement of Basis For Title V Permit

Company Name	Day-Glo Color Corp.	
Premise Number	13-18-00-6552	
What makes this facility a Title V facility?	HAPS	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.	Yes, P001 & P002 share a venturi scrubber. Both eus will be tested at the same time and must meet a combined PE limitation.	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1. - A.7.	35-07 (B)(2)		restrict HAP emissions to below major source thresholds beginning January 1, 2005.
A.8.	35-02 (C)		insignificant eus must comply with applicable state regs

? **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 & 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												
P007	3 lbs OC/ hr & 15 lbs /day OR 85% overall control	21-07 (G)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - operating parameters(pH & recirculation rate of scrubbing liquor) for tray tower scrubber identified ET - emissions testing required. M - Continuous parametric monitoring (pH and scrubber liquor recirculation rate) twice per shift recording required to demonstrate on-going compliance. Deviation reporting required
P001, P008, P009,	8 lb OC/ hour & 40 lb OC/day OR 85% overall control	21-07 (G)(2)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - operating parameters(pH & recirculation rate of scrubbing liquor) for packed tower scrubber identified ET - emissions testing required. M - Continuous parametric monitoring and twice per shift recording required to demonstrate on-going compliance. Deviation reporting required
P003	equipment requirements	21-09 (QQ)(2)	N	N	N	N	N	N	N	N	N	N	N	N	Mixers < 400 gallons must be equipped with lids
P021	equipment requirements	21-09 (QQ)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Limitation - Filtration system shall be a vacuum system which consists of a vacuum pump and condenser.
P001, P002, P003, P007, P008, P009, P014, P015, P021	20% opacity as 6-min ave from the stack	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	M - Stack visible emissions checks serve to indicate ongoing compliance with limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency.

P002, P003, P007, P015, P021	RACM for fug PE	17-08 (B)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Stack visible emissions checks serve to indicate ongoing compliance with limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified.
P002, P003, P007, P015, P021	20% opacity as 3-min ave for fug PE	17-07 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Stack visible emissions checks serve to indicate ongoing compliance with limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency.
P001 P002 P003 P007 P008 & P009 P015	1.15 lbs PE/hour 2.13 lbs PE/hour 1.49 lbs PE/hour 1.2 lbs PE/hour 1.5 lbs PE/hour 2.9 lbs PE/hour	17-11 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Continuous parametric monitoring (pressure drop & scrubber liquor recirculation rate (P001, P007, P008, P009, P015) or water feed rate (P002,P003)) and recording twice per shift required to demonstrate on-going compliance. Deviation reporting required. ET - emissions testing required for P001, P002, P007, P008, P009 and if required for P003
P014	11.83 Tons PE/year	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	N	TPY PE limit based upon hourly limit x 8760 hours.
P007, P014	See comments	31-05 (A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	PTIs No. 13-1058 for P007, 13-4233 for P014, and 13-2382 for P015 all require compliance with the applicable rules.
P014 P021	2.7 lbs PE/hr 0.551 lb PE/hour	17-11 (B)(1)	N	N	Y	N	N	N	Y	N	Y	N	N	N	M- daily visible emissions checks indicate on-going compliance Record keeping and Deviation reporting is required. Inherently clean language P021

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

? **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 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.
4. 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.