

Statement of Basis For Title V Permit

Part I - General	
Company Name	Composite Engineering
Premise Number	1413010484
What makes this facility a Title V facility?	Individual HAP (styrene) emissions greater than 10 TPY.
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.	NA
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).	NA
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).	NA
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 3745-77-8(D).	NA
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).	NA

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A..1	77-07	N	Listing of insignificant emission 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 & 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												
P001-P003	Total OC emissions from emissions units P001 - P003 combined shall not exceed 20 TPY.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3). OR - No OR is required to limit the emissions units to ensure compliance with the annual limit. M&R - The OC emissions from the emissions units are recorded on an annual basis. Rp - Annual report specifying the total OC emissions from the emissions units is required. ET - No emission testing is required, the emissions are recorded on an annual basis.
P001	1.43 lbs/hr of OC	N	Y	N	N	N	N	N	N	N	N	N	N	N	3745-31-05(A)(3) OR, M, R, Rp : NA ET: Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emission factor as determined in daily recordkeeping. Hourly emission rate is based on the emission unit's potential to emit; operating 8760 hours per year.

P001	34.4 lbs/day; of OC	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3) OR - The OC emission rate is calculated on a daily basis. No OR is required to limit the emissions unit to ensure compliance with the daily limit. M&R - The amount and styrene content of resins and gelcoats employed, the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for daily OC limits are present. ET - Compliance with the daily OC emissions rate shall be determined based on the calculation and recordkeeping.
P001	0.551 lb/hr of PM10; 2.41 TPY of PE/PM10	N	Y	N	N	N	N	N	N	N	N	N	Y	N	3745-31-05(A)(3) OR, M, R, Rp - NA ET - Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%. Compliance with the tons per year limitation is determined by multiplying the hourly limit of 0.551 lbs/hr by 8760 hrs/yr then dividing by 2000 lbs/ton.
P001	88 lbs of HAP per ton of resin	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	40 CFR Part 63, Subpart WWWW OR - The permittee shall employ non-HAP containing cleanup materials in this emissions unit. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. M&R - Monthly record keeping requirements for organic HAP content and HAP emissions are required. Rp - Quarterly reports are required for deviation from operational restrictions and for exceedances of the HAP content of the resins. ET - Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the monthly recordkeeping.
P001	20% opacity as a 6 min average	17- 07(A)	N	N	N	N	N	N	N	N	N	N	Y	N	OR, M, R, Rp: Not Applicable ET - Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and procedures specified in OAC rule 3745-17-03(B)(1).

P001	0.551 lb/hr; PE	17- 11(B)	N	N	N	N	N	N	N	N	N	N	Y	N	OR, M, R, Rp: Not Applicable ET - Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%.
P002	2.3 lbs/hr; OC	N	Y	N	N	N	N	N	N	N	N	N	Y	N	3745-31-05(A)(3) OR, M, R, Rp : NA ET: Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emission factor as determined in daily recordkeeping. Hourly emission rate is based on the emission unit's potential to emit; operating 8760 hours per year.
P002	40 lbs/day; OC	21-07 (G)(2)	N	N	N	N	N	Y	N	Y	N	N	Y	N	OR - The OC emission rate is calculated on a daily basis. No OR is required to limit the emissions unit to ensure compliance with the daily limit. M&R - The amount and styrene content of resins and gelcoats employed, the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for daily OC limits are present. ET - Compliance with the daily OC emissions rate shall be determined based on the calculation and recordkeeping.
P002	0.551 lb/hr of PM10; 2.41 TPY of PE/PM10	N	Y	N	N	N	N	N	N	N	N	N	Y	N	3745-31-05(A)(3) OR, M, R, Rp - NA ET - Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%. Compliance with the tons per year limitation is determined by multiplying the hourly limit of 0.551 lbs/hr by 8760 hrs/yr then dividing by 2000 lbs/ton.

P002	267 lbs of HAP/ton of white pigmented gel coating; 377 lbs of HAP/ton of other pigmented gel coating; 522 lbs of HAP/ton of clear production gel coat	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	40 CFR Part 63, Subpart WWWW OR - The permittee shall employ non-HAP containing cleanup materials in this emissions unit. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. M&R - Monthly record keeping requirements for organic HAP content and HAP emissions are required. Rp - Quarterly reports are required for deviation from operational restrictions and for exceedances of the HAP content of the resins. ET - Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the monthly recordkeeping.
P002	20% opacity as a 6 min average	17-07(A)	N	N	N	N	N	N	N	N	N	N	Y	N	OR, M, R, Rp: Not Applicable ET - Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and procedures specified in OAC rule 3745-17-03(B)(1).
P002	0.551 lb/hr; PE	17-11(B)	N	N	N	N	N	N	N	N	N	N	Y	N	OR, M, R, Rp: Not Applicable ET - Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the pounds of solids per pound of coating times one minus the transfer efficiency of 45% times one minus the control efficiency of 90%.
P003	2.5 lbs/hr; OC	N	Y	N	N	N	N	N	N	N	N	N	Y	N	3745-31-05(A)(3) OR, M, R, Rp : NA ET: Compliance with the hourly emissions limitation is determined based upon the maximum hourly coating usage times the emission factor as determined in daily recordkeeping. Hourly emission rate is based on the emission unit's potential to emit; operating 8760 hours per year.

P003	40.0 lbs/day; OC	21-07 (G)(2)	N	N	N	N	N	Y	N	Y	N	N	Y	N	OR - The OC emission rate is calculated on a daily basis. No OR is required to limit the emissions unit to ensure compliance with the daily limit. M&R - The amount and styrene content of resins and gelcoats employed, the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated. Rp - Deviation reports for daily OC limits are present. ET - Compliance with the daily OC emissions rate shall be determined based on the calculation and recordkeeping.
P003	123 lbs of HAP/ton of resin	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	40 CFR Part 63, Subpart WWWW OR - The permittee shall employ non-HAP containing cleanup materials in this emissions unit. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. M&R - Monthly record keeping requirements for organic HAP content and HAP emissions are required. Rp - Quarterly reports are required for deviation from operational restrictions and for exceedances of the HAP content of the resins. ET - Compliance shall be determined based upon the equations outlined in Table 1 of 40 CFR Part 63, Subpart WWWW and the monthly recordkeeping.
P004	4.8 lbs/hr and 6.05 TPY; acetone	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3) OR - maximum annual acetone usage shall not exceed 1833 gallons/year M&R - Monthly recordkeeping requirement for OC content and usage amount of cleanup material, documentation of whether each cleanup material is a PRM or not and total OC emissions from cleanup material usage are required Rp - Annual report that specifies total acetone usage, quarterly reports on deviation from operational restrictions, reporting within 45 days in case of use of PRMs with OC emissions estimation. ET - Hourly emission rate is based on the emissions unit's potential to emit; Annual emission rate is based upon recordkeeping requirement where acetone usage and OC emissions are calculated by summing based on monthly recordkeeping.

P004	No HAP containing cleanup material shall be employed.	N	Y	N	Y	N	N	N	N	N	Y	N	N	N	40 CFR Part 63, Subpart WWWW OR - No HAP containing cleanup materials shall be employed. M&R - NA Rp - Quarterly reports for deviations from operational restriction ET - NA
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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.
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.

- 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 to 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 to be initiated by an appeal by including the ERAC case number in "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.