

Statement of Basis For Title V Permit

Company Name	Diversapack, LLC	
Premise Number	1431170674	
What makes this facility a Title V facility?	VOC emissions greater than 100 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.	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)	As part of the renewal, we are adding compliance assurance monitoring provisions and also adding our current standard terms and conditions for control devices pursuant to Andrew Hall's General Electric (GE) memo dated 07/11/06 as a result of a State of Ohio Environmental Review Appeals Commission (ERAC) decision that were not previously listed in the originally issued final Title V permitting action.	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

A.1.a	77-01(U)	List of insignificant emissions units.
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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	EN F	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K004 K005 K006 K007 K010 K013	10 TPY single HAP, 25 TPY combined HAPS	77- 07(A)(1)	40 CFR Part 63, KK	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 65% capture, 90% destruction; 10 TPY single HAP, 25 TPY combined HAP limits; interlock system on oxidizer M&R- HAP monitoring and record keeping to show compliance with 40 CFR 63, KK. Rp- Quarterly deviation and annual HAP usage and emissions reports will demonstrate compliance with HAP limitations. ET- Compliance ensured by maintaining monitoring requirements.

K004 K005 K006 K007	Capture efficiency of 65% by weight, destruction efficiency of 90% by weight	21-09(Y)(1)(b)	40 CFR Part 63, KK	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Catalytic oxidizer with interlocking system will operate at all times the emissions units are in operation. Oxidizer will operate at a temperature not less than 50 degrees below the average temperature of last compliance test. Average static pressure of inlet plenum maintained at a value at least 95% of the value recorded during the last compliance test. M&R - Daily records which document average temperature not less than 50 degrees below the average temperature of last compliance test and across catalyst bed, log of oxidizer downtime and static pressure at the inlet plenum to the oxidizer. Catalyst activity. Rp - Deviation reports for average temperature across catalyst bed and static pressure range. ET - A five year testing frequency was determined to be sufficient to demonstrate compliance due to facility's history of compliance.
K010	2.9 lbs VOC/gal of coatings	21-09(F)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 10 TPY single HAP, 25 TPY combined HAPs limit M&R - Monthly monitoring and record keeping of coating ID and VOC per gallon coating will demonstrate compliance with lb/gal limitation. Rp - Report of noncompliant coating within 30 days following end of calendar month. ET - Method 24 or 24A if required.
K013	290 lbs/day VOC	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - VOC content limit of 20% VOC as daily volume-weighted average. M&R - Daily record keeping of VOC emissions. Rp - Deviation of daily volume-weighted average VOC content. Compliance with this rule will demonstrate compliance with daily emissions limitation. ET - Compliance ensured by maintaining monitoring requirements.
K013	1.1 lbs/hr and 3.7 TPY ammonia	31-05(A)(3)		N	N	N	N	N	N	N	N	N	N	N	OR - Ammonia emission based on potential to emit so no operational restriction required. M,R,& Rp - Short term limitation is based upon potential to emit so no record keeping or reporting is necessary. Compliance with annual limitation is assumed provided compliance is maintained with rolling, 12-month VOC limit. ET - Compliance ensured by maintaining monitoring requirements.

K013	20% VOC content of coatings and inks	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR - 20% VOC content for coatings and inks M&R - Daily record keeping of % VOC by volume as a daily-weighted average. Rp - Deviation of daily volume-weighted average VOC content. ET - Compliance ensured by maintaining monitoring requirements.
K013	37.5 TPY VOC as a rolling, 12-month summation	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 20% VOC content for coatings and inks M&R - Monthly VOC emissions including the rolling, 12-month summation. Rp - Annual reports showing rolling, 12-month summation of VOC emissions. ET - Compliance ensured by maintaining monitoring requirements.
L001	Cold cleaner operated with cover	21-09(O)(2)		N	Y	N	N	N	N	N	N	N	N	N	OR - Cold cleaner operated with cover M&R - There is no monitoring or record keeping associated with this rule. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by good engineering practices and inspections.
L001	Cold cleaner equipped with device for draining	21-09(O)(2)		N	Y	Y	N	N	Y	N	N	N	N	N	OR - Cold cleaner shall be equipped with a device for draining; clean parts shall drain until dripping ceases. M&R - Monitoring for vapor pressure of solvent, types of solvents and temperature at operation. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by good engineering practices and inspections.
L001	Freeboard ration of greater than or equal to 0.7.	21-09(O)(2)		N	Y	N	N	N	N	N	N	N	Y	N	OR - Freeboard ration of greater than or equal to 0.7 shall be maintained. M&R - There is no monitoring and record keeping associated with this rule. Rp - There is no reporting requirements associated with this rule. ET - Compliance assured by measuring the freeboard ratio. The freeboard ration is determined by dividing the height by the width.

L001	Vapor pressure shall not exceed 1.0 mmHg at 20 degrees Celsius	21-09(O) (2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Vapor pressure shall not exceed 1.0 mmHg at 20 degrees Celsius. M&R - Vapor pressure of each solvent at 20 degrees Celsius. Rp- Quarterly deviation reports for any time operating with a vapor pressure greater than 1.0 mmHG at 20 degrees Celsius. ET - Compliance ensured by maintaining monitoring requirements.
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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.