

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Cincinnati Drum Service, Inc	
Premise Number	1431391663	
What makes this facility a Title V facility?	Potential Emissions of VOC greater than 100 TPY	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 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)	N/A	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1	77-07(A)(13)		Listing of insignificant emissions units
A.2		40 CFR Part 63 Subpart MMMM	40 CFR Part 63 Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products requirements are spelled out in this section.

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**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- )	Oth er												

K001, K002	3.5 lbs of VOC per gallon of coating minus exempt solvents and water	21- 09(U)(1)(f )		NA	Y	Y	N	N	Y	N	Y	N	N	N	<p>This is an uncontrolled emission unit, therefore CAM is not applicable.</p> <p>OR-Compliance coatings required, 3.5 lbs of VOC per gallon of coating minus exempt solvents and water limit in place.</p> <p>M - The VOC content of coatings employed are recorded.</p> <p>R- Deviation reports for non-compliant coatings are required.</p> <p>ET - No emission testing is required, compliant coatings are employed.</p>
K003, K004	4.3 lbs of VOC per gallon of coating minus exempt solvents and water	21- 09(U)(1)( e)		NA	Y	Y	N	N	Y	N	Y	N	N	N	<p>This is an uncontrolled emission unit, therefore CAM is not applicable.</p> <p>OR-Compliance coatings required, 4.3 lbs of VOC per gallon of coating minus exempt solvents and water limit in place.</p> <p>M - The VOC content of coatings employed are recorded.</p> <p>R- Deviation reports for non-compliant coatings are required.</p> <p>ET - No emission testing is required, compliant coatings are employed.</p>
K001- K004	Visible particulate emissions shall not exceed 20% opacity as a six- minute average	17-07(A)		NA	Y	Y	N	N	Y	N	Y	N	N	N	<p>The uncontrolled particulate emissions from this emission unit is less than 100 TPY. Therefore CAM is not applicable.</p> <p>OR - A water wash system for over spray is required.</p> <p>M - Records are required to document the water wash system was in use while the emission unit was in operation.</p> <p>R-Deviation reports are required for periods the emission unit was in operation an the water wash system was not employed.</p> <p>ET - No visible emission readings from this emission unit are necessary. Minimal visible emissions are present.</p>

K001-K004	0.551 lb PE/hr	17-11(B)(1)		NA	Y	Y	N	N	Y	N	Y	N	N	N	<p>The uncontrolled particulate emissions from this emission unit is less than 100 TPY. Therefore CAM is not applicable.</p> <p>OR - A water wash system for over spray is required.</p> <p>M - Records are required to document the water wash system was in use while the emission unit was in operation.</p> <p>R-Deviation reports are required for periods the emission unit was in operation an the water wash system was not employed.</p> <p>ET - The potential PE emission are less than the allowable. Therefore stack testing is not required. Emission calculations demonstrating compliance with the allowable PE are present in the testing section.</p>
N001	Visible particulate emissions shall not exceed 20% opacity as a six-minute average	17-07(A)		NA	Y	Y	N	N	Y	N	Y	N	Y	N	<p>The uncontrolled particulate emissions from this emission unit is less than 100 TPY. Therefore CAM is not applicable.</p> <p>OR - The use of an afterburner is required to control particulate emissions. A minimum temperature requirement is present as well.</p> <p>M - The temperature of the afterburner is continually collected and recorded. Daily visible particulate emission checks are performed and the results recorded.</p> <p>R - Deviation reports for temperature excursions and daily visible emission checks are required.</p> <p>ET - A PE stack test and Method Nine visible particulate emission readings are required every 2.5 years.</p>

N001	0.10 pound PE per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator .	17-09(B)		NA	Y	Y	N	N	Y	N	Y	N	Y	N	The uncontrolled particulate emissions from this emission unit is less than 100 TPY. Therefore CAM is not applicable. OR - The use of an afterburner is required to control particulate emissions. A minimum temperature requirement is present as well. M - The temperature of the afterburner is continually collected and recorded. Daily visible particulate emission checks are performed and the results recorded. R - Deviation reports for temperature excursions and daily visible emission checks are required. ET - A PE stack test and Method Nine visible particulate emission readings are required every 2.5 years.
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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.
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.

- **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.