

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	<b>3M Medina</b>
Premise Number	<b>1652050059</b>
What makes this facility a Title V facility?	<b>VOC and HAP</b>
<b>Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?</b>	<b>Yes</b>
<b>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.</b>	<b>No</b>

<p>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)</p>	<p><b>Specific Facility Terms and Conditions A.1 and A.2 were added to address MACT applicability, compliance date for MACT and MACT limitations for 40 CFR Part 63, subpart JJJJ. Specific Facility Term and Condition A.3 was added to address the insignificant emissions units with applicable rules. Specific Facility Term and condition A.3 and B.3 added additional insignificant emissions units that were not previously listed (i.e., 2008 - 2012) and emissions unit K002 was changed to a significant emissions units from insignificant.</b></p> <p><b>Emissions unit K001 changed to reflect the change in control equipment. Changed control equipment from a catalytic incinerator to a thermal incinerator. Also, added term to allow complying coatings to be vented to atmosphere.</b></p> <p><b>Changed emissions unit K002 from insignificant to significant.</b></p> <p><b>PTI 16-02375 for emissions unit K003, increased the allowable hourly and yearly emission limitations for OC. Increased the pound per gallon VOC emission limitation. Also, put the requirements of 40 CFR Part 60, subpart RR in the permit and the emission limitations for 40 CFR Part 63, subpart JJJJ. Removed the operational restrictions ( i.e., 100% water-based emulsion adhesive and not employing any photochemically reactive materials for cleanup in the emissions unit). Record keeping changed to track new emission limitations.</b></p> <p><b>PTI 16-02229 for emissions unit K004, increased the allowable cleanup material emissions. Removed the operational restriction of employing only water-based emulsion adhesive coatings and not employing any photochemically reactive material for cleanup. Added an operational restriction of only employing natural gas as fuel in the drying oven. Updated the record keeping, reporting, and testing requirements for 40 CFR Part 60, subpart RR.</b></p> <p><b>Added emissions units K005 and L001 which were installed under PTI 16-02263.</b></p>
<p>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)</p>	<p>N/A</p>
<p>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)</p>	<p>N/A</p>

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		Comments
	SIP (3745- )	Other	
A.1	N	Y	Other - 40 CFR Part 63, subpart JJJJ
A.2	N	Y	Other - 40 CFR Part 63, subpart JJJJ
A.3	77- 07(A)( 130	N	List of insignificant emissions units that are either subject to a Permit to Install or part of the SIP.

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	Comments
		SIP (3745- )	Other												
K001	75% , by weight, capture efficiency and 90%, by weight, control efficiency	21- 09(H)(2 )	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Average combustion temperature within the thermal oxidizer shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that showed compliance. Appropriate monitoring, record keeping, and reporting requirements have been specified. Currently, not subject to CAM.

K002, K003, and K004	0.20 kg VOC/kg of coating solids	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - 40 CFR Part 60, subpart RR ET - Method 24 to determine the VOC content of the coatings.
K002 and K003	2.9 lbs VOC per gallon of coating, excluding exempt solvent and water	21-09(F)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET- Method 24 to determine the VOC content of the coatings.
K003	65.0 pounds of OC per hour	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emission limitation based on calculation of the worst-case scenario (i.e., maximum capacity times highest OC content) Other - OAC rule 3745-31-05(A)(3)
K003	Both the annual combined coating and cleanup material usage OC input rate and the annual OC emissions shall not exceed 32.6 tons of OC per year as a rolling, 12-month summation	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance based on tracking the OC content and usage for coatings and cleanup materials. Other - OAC ruel 3745-31-05(C)

K003	<p>You must limit organic HAP emissions to the level specified in paragraph a, b, c, or d below:</p> <p>a. No more than 5 percent of the organic HAP applied for each month (95% reduction) ; or</p> <p>b. No more than 4% of the mass of coating materials applied for each month; or</p> <p>c. No more than 20 percent of the mass of coating solids applied for each month; or</p> <p>d. an outlet organic HAP</p>	N	Y	N	N	N	N	N	N	N	N	N	N	N	<p>Other - 40 CFR Part 63, subpart JJJJ</p> <p>M, R, Rp, ET - Compliance date is December 5, 2005. At this time what the facility is going to comply with has not been determined. At renewal, the terms and conditions for the MACT will be added.</p>
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K004	22.5 lbs/day OC from cleanup	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emission limitation was based on a potential to emit calculation using the maximum OC content of the cleanup material and the maximum daily usage.  Other - OAC rule 3745-31-05
K004	4.11 tons/year OC from cleanup	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emission limitation was based on a potential to emit calculation using the maximum daily emissions times the maximum days per year.  Other - OAC rule 3745-31-05
K004	0.899 lb of OC/gallon of coating after final formulation, excluding water	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - The OC content of the coating is determined through formulation data or Method 24  Other - OAC rule 3745-31-05
K004	35.9 tons/year OC from coatings	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emissions limitation was based on a potential to emit calculation using the allowable VOC content times the maximum gallons of coating employed.  Other - OAC rule 3745-31-05
K005	25.7 lbs/hr VOC	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emission limitation was based on a potential to emit calculation. Can also use the testing for the 98% overall VOC emission reduction to determine compliance with the hourly limitation.  Other - OAC rule 3745-31-05(A)(3)
K005	112.57 tons/year VOC	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Results from the overall control efficiency test are used to determine the annual emissions.  Other - OAC rule 3745-31-05(A)(3)
K005	5% opacity from any stack as a 6-minute average	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Method 9 could be required in the future. Visible emissions will either be verified during stack test or during a full compliance evaluation.  Other - OAC rule 3745-31-05(A)(3)

K005	0.1 lb/hr & 0.4 ton/year particulate emissions ; 13.2 lbs/hr & 57.8 tons/year NOx; and 8.26 lbs/hr & 36.2 tons/year CO	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The emission limitations are based upon the potential to emit as determined from vender emissions data. If necessary, stack testing may be required.  Other - OAC rule 3745-31-05(A)(3)
K005	98% overall VOC emission reduction	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The average combustion temperature shall not be more than 50 degrees Fahrenheit below the most recent compliance test that showed compliance. Appropriate monitoring, record keeping, and reporting requirements have been specified. Currently, not subject to CAM.  Other - OAC rule 3745-31-05(A)(3)
K005	95% overall HAP emission reduction; 0.04 kg of HAPs emitted/kg of coating applied; or 0.20 kg of HAPs emitted/kg of coating solids applied	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - These are emission limitations for 40 CFR Part 63, subpart JJJJ. The terms will be added upon renewal for this MACT. Compliance date for rule is not until December 5, 2005.  Other - 40 CFR Part 63, subpart JJJJ
L001	0.9 lb/hr VOC	N	Y	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - Emissions limitation was based on a potential to emit calculation using the maximum VOC content times the maximum gallons of solvent employed per year divided by 8760 hours per year.  Other - OAC rule 3745-31-05(A)(3)

L001	4.0 tons/year VOC	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Emissions are determined through solvent usage records and VOC content of the solvent.  Other OAC rule 3745-31-05(A)(3)
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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.