

Statement of Basis For Title V Permit

Part I - General

Company Name	Schneller, Inc.	
Premise Number	1667040015	
What makes this facility a Title V facility?	VOC and HAPs	
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)	The facility submitted a minor modification after the Title V permit renewal application was submitted to cover PTI 16-02376 for emissions unit K007 which increased its emissions and change the method of compliance for 40 CFR Part 63, subpart JJJJ. This minor modification is being processed as the Title V permit renewal.	
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)

40 CFR Part 63, subpart A as applicable to 40 CFR Part 63, subpart JJJJ was added to the Specific Facility Terms and Conditions. Facility-wide limitation for VOC was added to the Specific Facility Terms and Conditions section to keep the facility from being a major source under PSD. PTI 16-01949 for emissions unit K001 changed to allow for solvent coatings to be used by employing control equipment under BAT which was more stringent than OAC rules 3745-21-09(B)(6) and 3745-21-09(H) and increased the emission limitations. Applicable parts 40 CFR Part 60, subpart FFF, 40 CFR Part 63, subparts KK and JJJJ, and 40 CFR Part 64 were added to emissions unit K001. PTI 16-02186 for emissions unit K003, to add the rotogravure printing capability, increased hours of operation, and decreased hourly emission limitations. Applicable parts 40 CFR Part 60, subpart FFF, 40 CFR Part 63, subparts KK and JJJJ, and 40 CFR Part 64 were added to K003. PTI 16-01601 for emissions unit K004 was administrative modified to change compliance to OAC rule 3745-21-09(B)(6) instead of OAC rules 3745-21-09(F) and (G) and to update the terms to match the existing Title V permit. Applicable parts of 40 CFR Part 63, subpart JJJJ and 40 CFR Part 64 were added emissions unit K004. PTI 16-01601 was administratively modified to updated the terms to match the existing Title V permit. Applicable parts 40 CFR Part 60, subpart FFF, 40 CFR Part 63, subparts KK and JJJJ, and 40 CFR Part 64 were added to K005. PTI 16-01557 was administrative modified to change record keeping to daily and to clarify the emission limitations for emissions unit K006. PTI 16-02376 for emissions unit K007 increased the hourly emission limits. The PTI also change the chose of compliance for 40 CFR Part 63, subpart JJJJ. K007 was not in the previously issued Title V permit. K007 is also subject to 40 CFR Part 64. Emissions unit P002 terms were changed to reflect view of applicability of OAC rule 3745-21-07(G)(2). The restrictions were removed and a facility-wide emission limitation was used instead to limit VOC emissions below 250 tpy.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1	77-07(A)(1)	N	States that the facility has requested to restrict the emissions of VOC to 245.0 tons per year
A.2	77-07(A)(1)	N	Establishes the cumulative emissions for the first 12 months.
A.3, A.3.a through A.3.h	77-07(A)(3)(a)	N	Record keeping for emissions units K001, K003, K004, K005, K006, K007, and P002 to determine the actual VOC emission.
A.4	77-07(A)(3)(c)	N	Deviation reporting for the VOC emission limitation.
A.5	77-07(A)(3)(c)	N	Annual reporting for the yearly VOC emissions from the facility.
A.6 and A.6.a	77-07(A)(1)	N	Explanation of how compliance with the VOC emission limitation is determined.
A.7	77-07(A)(13)	N	List of insignificant emissions 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 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-)	Other												
K001	20.3 lb/hr VOC for coatings	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	<p>Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred.</p> <p>ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.</p>
K001	60.9 TPY of VOC, as a rolling 12- month summatio n for coatings	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred except for the 12 month cumulative operating hours and its associated record keeping and reporting since the first 12 months have already passed.</p> <p>OR - Restriction on the annual operating hours excluding cleanup time. The appropriate monitoring, record keeping, and reporting requirements have been specified.</p> <p>ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily and monthly records are used to determine compliance with the emission limitation.</p>

K001	3.24 TPY of VOC, as a rolling 12-month summation for the cleanup materials	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred except for the 12 month cumulative usage limits and its associated record keeping and reporting since the first 12 months have already passed. OR - Restriction on the cleanup material usage. The appropriate monitoring, record keeping, and reporting requirements have been specified. ET - The emissions are based on the cleanup material usage. The cleanup material used is considered to be emitted to the atmosphere and would not require stack testing.
K001	a control (destruction efficiency which is at least 96 percent, by weight, and a capture efficiency shall be at least 98.2 percent, by weight for VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred. OR - Restriction on the average combustion temperature. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.
K001, K003, and K005	The permittee shall reduce the VOC emissions to the atmosphere by 85 percent from each affected facility	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - 40 CFR Part 60, Subpart FFF OR - The actual operating restriction is included in the monitoring and record keeping section of the permit. Restriction on the average temperature of the exhaust gases. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.

K001, K003, K005, and K007	The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations in each month shall never exceed five percent, by weight, of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - 40 CFR Part 63, Subpart KK ET - The emission limitation is based on mass used. Compliance is determined through tracking the mass employed on the rotogravure station compared to all the coating stations.
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K001, K003, K004, K005, and K007	The permittee shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction)	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - 40 CFR Part 63, subpart JJJJ OR - Minimum average combustion temperature and operating parameter value or range of values for capture efficiency. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.
K003	16.25 lbs/hr VOC for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3): All the terms and conditions from the permit to install have been transferred. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.
K003	71.2 TPY of VOC emissions, as a rolling, 12-month summation from all the coatings and cleanup materials employed	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily and monthly records are used to determine compliance with the emission limitation.

K003	a control (destruction) efficiency which is at least 96 percent, by weight, and the capture efficiency shall be at least 92.2 percent, by weight for VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05(C): All the terms and conditions from the permit to install have been transferred. OR - Restriction on the average combustion temperature. The appropriate monitoring, record keeping, and reporting requirements have been specified. Also, an operational restriction for the amount of VOC vented to the incinerator from K003-K005. CAM is currently applicable.
K004	19.34 lbs/hr VOC for coatings and cleanup material	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05: The terms and conditions from the permit to install have been slightly modified for the monitoring and record keeping section to more accurately determine compliance with the hourly VOC limitation. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.
K004	84.7 TPY of VOC for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05: The terms and conditions from the permit to install have been slightly modified for the monitoring and record keeping section to more accurately determine compliance with the annual VOC limitation. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.

K004	a control (destruction) efficiency which is at least 96 percent, by weight, and the capture efficiency shall be at least 98.5 percent, by weight for VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05: The thermal incinerator reporting was changed to match OAC rule 3745-21-09(B)(3)(m) reporting requirements. OR - Restriction on the average combustion temperature. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.
K005	7.83 lbs/hr of VOC for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05: The terms and conditions from the permit to install have been slightly modified for the monitoring and record keeping section to more accurately determine compliance with the hourly VOC limitation. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.
K005	34.3 TPY of VOC for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05: The terms and conditions from the permit to install have been slightly modified for the monitoring and record keeping section to more accurately determine compliance with the annual VOC limitation. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with daily records are used to determine compliance with the emission limitation.

K005	a control (destruction) efficiency which is at least 96 percent, by weight, and the capture efficiency shall be at least 95 percent, by weight for VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05: The due date of the thermal incinerator reporting was changed to match the reporting that the other emissions units that are vent to the same incinerator are required by to do by OAC rule 3745-21-09(B)(3)(m). OR - Restriction on the average combustion temperature. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.
K006	8 lbs/hr of OC for coatings and photochemically reactive cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - This emissions unit does not have control equipment that would need stack tested. Compliance is determined through coating and photochemically reactive cleanup material usage, hours of operation, and OC content for the coating/photochemically reactive cleanup materials. Other - OAC rule 3745-31-05(A)(3): emission limits were clarified and record keeping changed to daily instead of hourly.
K006	40 lbs/day of OC for coatings and photochemically reactive cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - This emissions unit does not have control equipment that would need stack tested. Compliance is determined through daily records of coating and photochemically reactive cleanup material usage and OC content for the coating/photochemically reactive cleanup materials Other - OAC rule 3745-31-05(A)(3): emission limits were clarified and record keeping changed to daily instead of hourly.

K006	10.6 tons of OC per year for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	ET - This emissions unit does not have control equipment that would need stack tested. Compliance is determined through monthly and daily record keeping of coating and cleanup material usage and OC content for the coating/cleanup materials Other - OAC rule 3745-31-05(A)(3): emission limits were clarified and added record keeping for yearly limit that was added to PTI administrative modification.
K007	2.5 lbs of VOC/hr for coatings	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3): All the terms and conditions from the permit to install have been transferred. M, R, Rp, and ET - The emission limitation was established by the facility doing a study to establish an emission factor for VOC emissions. Using the emission factor times the maximum hourly production rate and then time the overall allowable control efficiency emission limitation, the maximum hourly emissions is determined. The overall control efficiency is verified through emission testing.
K007	12.0 tons of VOC per year for coatings and cleanup material	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3): All the terms and conditions from the permit to install have been transferred. ET - This emissions unit is required to do emission testing for the capture efficiency for the emissions unit and emission testing for the control efficiency of the thermal incinerator. The results of this emission testing along with monthly records are used to determine compliance with the emission limitation.
K007	95% overall control efficiency for VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05(A)(3): All the terms and conditions from the permit to install have been transferred. OR - Restriction on the average combustion temperature. Restriction on minimum pressure differential or minimum facial velocity for the enclosure. The appropriate monitoring, record keeping, and reporting requirements have been specified. CAM is currently applicable.

K007	On the rotogravure printing station, the permittee shall employ inks with a weighted average VOC content of less than 1.0 kilogram of VOC per kilogram ink solids	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - 40 CFR Part 60, Subpart FFF
P002	8 lbs/hr of OC	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - This emissions unit does not have control equipment that would need stack tested. Compliance is determined through amount of material mixed and cleanup material usage, hours of operation, and OC content for the cleanup materials.
P002	40 lbs/day of OC	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - This emissions unit does not have control equipment that would need stack tested. Compliance is determined through amount of material mixed and cleanup material usage, hours of operation, and OC content for the cleanup materials.

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.