

Statement of Basis For Title V Permit

Part I - General	
Company Name	E. L. Stone Company
Premise Number	1677020039
What makes this facility a Title V facility?	MAJOR Source of VOC based on POTENTIAL EMISSIONS
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)	K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K016. Changed by the addition of a synthetic minor to reduce HAP emissions from the facility to less than major source thresholds to avoid the requirement of 40 CFR 63 Subpart M, and P, neither of which have been promulgated at this time.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
24.9 tpy of combined hazardous air pollutant (HAP) emissions, on a rolling, 12-month basis; and	35-07(B)(2)		In order to avoid the requirements of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp, the permittee has voluntarily excepted facility-wide emission limitations.
9.95 tpy of individual HAP emissions, on a rolling, 12-month basis	35-07(B)(2)		In order to avoid the requirements of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp, the permittee has voluntarily excepted facility-wide emission limitations.
The facility-wide annual coating usage shall be limited to 9,000 gallons, based upon rolling, 12-month summations.	35-07(B)(2)		In order to avoid the requirements of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp, the permittee has voluntarily excepted facility-wide Operating Restrictions. Appropriate Monitoring, Recordkeeping, and Reporting have been incorporated into the requirements of the individual emissions units to ensure compliance with these restrictions.
Each coating employed shall contain a total combined HAP content of less than 5.54 pounds per gallon, as applied, and an individual HAP content of less than 2.20 pounds per gallon, as applied.	35-07(B)(2)		In order to avoid the requirements of 40 CFR Part 63, Subpart Mmmm and Subpart Pppp, the permittee has voluntarily excepted facility-wide Operating Restrictions. Appropriate Monitoring, Recordkeeping, Reporting and testing requirements have been incorporated into the requirements of the individual emissions units to ensure compliance with these restrictions.

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 K009 K010 K011 K017 K018 K019 K020 K024 K025 K026	Emissions of organic compounds shall not exceed 7.3 tpy.	05(A)(3) (PTI 16-022 52)		N	N	Y	N	N	Y	N	Y	N	N		<p>M -Formulation data is used to determine OC content.</p> <p>R - Daily coating usage, and monthly solvent usage recordkeeping is required.</p> <p>Rp - Excursion reporting is required.</p> <p>ET - Compliance is demonstrated by the record keeping in Section A.III.1.</p>
K001 through K026	8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.	-21-07(G)(2)		N	N	Y	N	N	Y	Y	N	N	N		<p>Applicable on days when coating of nonmetal parts, during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in these emissions units.</p> <p>M -Formulation data or USEPA Method 24 is used to determine OC content.</p> <p>R - Daily record keeping is used to document the daily usage of each coating and clean-up material, and the calculated hourly and daily OC emissions.</p> <p>Rp - The facility is maintaining records and will have them available for inspection during reasonable times.</p> <p>ET - Compliance is demonstrated through monitoring and record keeping.</p>

K001 through K026	20% opacity as a six-minute average	17-07		N	Y	N	N	N	Y	N	Y	N	N		<p>OR - Disposable paper filters are required to be in service during operation of this emissions unit.</p> <p>M - Monitoring is not required to demonstrate compliance.</p> <p>R - Recordkeeping is required to demonstrate that the disposable paper filters were in service during operation</p> <p>Rp - Report submittal is required when the emissions unit is operated without the disposable paper filters.</p> <p>ET - Compliance can be determined at any reasonable time by observing the emissions unit in operation.</p>
K001 through K026	0.551 pound per hour particulate matter	17-11	N	N	N	N	N	N	N	N	N	N	N		<p>M - not required to demonstrate compliance.</p> <p>R - not required to demonstrate compliance.</p> <p>Rp - not required to demonstrate compliance.</p> <p>ET - Compliance can be determined at any reasonable time by using the calculation in Section A.V.1.e</p>
K001 through K026	3.0 gallons per day coating usage restriction	21-09(U)(2)(e)(ii)		N	Y	Y	N	N	Y	N	Y	N	N		<p>OR - The daily usage restriction is necessary to comply with the rule exemption.</p> <p>M - Monitoring is not required to determine compliance.</p> <p>R - Daily coating usage recordkeeping is required.</p> <p>Rp - Excursion reporting is required.</p> <p>ET - Compliance is demonstrated by the record keeping in Section A.III.1.</p>

K001 through K026	the VOC content of all metal coatings employed shall not exceed 3.5 pounds VOC per gallon (excluding water and exempt solvents) when applying high performance coatings, and 6.2 pounds of VOC per gallon of coating, (excluding water and exempt solvents), as employed, when employing high performance architectural coatings as a daily, volume-weighted average,	21-09(U)(1)(d)		Y	Y	Y	N	N	Y	N	Y	N	N	<p>If this emissions unit ever employs more than 3.0 gallons of coating on metal parts in any given day, thereafter, these limitations are applicable to the emissions unit in which exceeded the 3.0 gallons per day. The limitation, monitoring, recordkeeping and reporting language is in place for the event that one of these emissions units should happen to exceed the 3.0 gallon per day limitation.</p> <p>ND - These limitations are not applicable as long as the 3.0 gallons of coating per day per emissions unit are never exceeded.</p> <p>M -Formulation data is used to determine the OC content.</p> <p>R - Daily coating usage recordkeeping is required.</p> <p>Rp - Excursion reporting is required.</p> <p>ET - Compliance is demonstrated by the record keeping in Section A.III.5.</p>
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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.