

# Statement of Basis For Title V Permit

01/06/05

Part I - General	
Company Name	Cleveland Manufacturing Division, Robin Industries
Premise Number	13-18-00-5887
What makes this facility a Title V facility?	Major source of HAP emissions, MACT Subpart T & MACT Subpart MMMM
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

<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)</p>	<p>L001 - No major changes in the renewal terms. Added citations and clarified language to be consistent with current practices. Subject to 40 CFR Part 63 Subpart T.  K001 (PTI #13-04237) The terms and conditions have changed for this emissions unit since the original Title V permit was issued. To allow for more manufacturing flexibility, the emissions unit was broken out into 8 emissions units, each being limited to using no more than 3 gal/day of coating. It is subject to 40 CFR Part 63 Subpart Mmmm.  K002 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K003 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K004 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K005 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K006 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K007 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.  K008 (PTI #13-04237) This is a new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart Mmmm.</p>
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<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1	N	Y	40 CFR Part 63, Subpart Mmmm
A.2	N	Y	40 CFR Part 63, Subpart T
A.3	77	N	SIP; Insignificant emissions units are listed.

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.

<b>Part III (Requirements Within the State and Federally Enforceable Section)</b>
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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	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745- )	Other												
L001	Compliance as required by MACT Subpart T	N	40 CFR Part 63, Subpart T	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.</p> <p>OR - Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.</p> <p>OR - Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine.</p> <p>OR - Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.</p> <p>OR - During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.</p> <p>OR - During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.</p> <p>OR - When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.</p>

															<p>OR - The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment.</p> <p>OR - The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Ohio EPA or Cleveland DAQ.</p> <p>OR - Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.</p> <p>OR - Sponges, fabric, wood, and paper products shall not be cleaned.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent.</p> <p>M - As required by Subpart T for ongoing compliance.</p> <p>ET - Monitoring as required by Subpart T and material usage is sufficient to determine compliance.</p>
K001	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.	31-05 (A) (3)  21-09(U)(2)(e)(ii)	40 CFR Part 63, Subpart MMM M	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.</p> <p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p>

	Compliance as required by Subpart MMMM														<p>M - Record keeping of material usage and the requirement by Subpart MMMM.</p> <p>ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.</p>
K002	<p>Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.</p> <p>Compliance as required by Subpart MMMM</p>	<p>31-05 (A) (3)</p> <p>21-09(U)(2)(e)(ii)</p>	40 CFR Part 63, Subpart MMM M	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.</p> <p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p> <p>M - Record keeping of material usage and the requirement by Subpart MMMM.</p> <p>ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.</p>
K003	<p>Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.</p>	<p>31-05 (A) (3)</p> <p>21-09(U)(2)(e)(ii)</p>	40 CFR Part 63, Subpart MMM M	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.</p> <p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p>

	Compliance as required by Subpart MMMM															M - Record keeping of material usage and the requirement by Subpart MMMM.  ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.
K004	<p>Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.</p> <p>Compliance as required by Subpart MMMM</p>	<p>31-05 (A) (3)</p> <p>21-09(U)(2)(e)(ii)</p>	<p>40 CFR Part 63, Subpart MMM M</p>	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.</p> <p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p> <p>M - Record keeping of material usage and the requirement by Subpart MMMM.</p> <p>ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.</p>
K005	<p>Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.</p> <p>Compliance as required by Subpart MMMM</p>	<p>31-05 (A) (3)</p> <p>21-09(U)(2)(e)(ii)</p>	<p>40 CFR Part 63, Subpart MMM M</p>	N	Y	Y	N	N	Y	N	Y	N	N	N	N	<p>OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.</p> <p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p> <p>M - Record keeping of material usage and the requirement by Subpart MMMM.</p> <p>ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.</p>
K006	Volatile	31-05	40 CFR	N	Y	Y	N	N	Y	N	Y	N	N	N	N	OR - Permittee shall use one or more work

	organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.  Compliance as required by Subpart MMMM	(A) (3) 21-09(U)(2)(e)(ii)	Part 63, Subpart MMM M												practice standards in 40 CFR Part 63, Subpart MMMM.  OR - Permittee shall employ no more than 3 gallons of coatings in any one day.  OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.  M - Record keeping of material usage and the requirement by Subpart MMMM.  ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.
K007	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.  Compliance as required by Subpart MMMM	31-05 (A) (3) 21-09(U)(2)(e)(ii)	40 CFR Part 63, Subpart MMM M	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.  OR - Permittee shall employ no more than 3 gallons of coatings in any one day.  OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.  M - Record keeping of material usage and the requirement by Subpart MMMM.  ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.
K008	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61	31-05 (A) (3) 21-09(U)(2)(e)(ii)	40 CFR Part 63, Subpart MMM M	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Permittee shall use one or more work practice standards in 40 CFR Part 63, Subpart MMMM.  OR - Permittee shall employ no more than 3 gallons of coatings in any one day.  OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no



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.

- C 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.