

Statement of Basis For Title V Permit

Company Name	International Paper - Akrosil Division	
Premise Number	0123010216	
Number of Non-insignificant Emissions Units	4	
What makes this facility a Title V facility?	Potential emissions of VOCs.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
n/a			

- **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.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (374 5-)	Other							
P001	8 lbs of OC/hr and 40 lbs OC/day	21-07 (G)(2)		n	y	y	y	n	y	ET- Compliance based upon Method 24 analyses and record keeping requirements. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
P002	8 lbs of OC/hr and 40 lbs OC/day	n	y	n	y	y	y	n	y	Other - Emission limitation established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. ET- Compliance based upon Method 24 analyses and record keeping requirements. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
P001	7.3 Tons OC/yr	n	y	y	y	y	y	n	y	Other - Emission limitation established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. OR- Coating production and OC content restrictions to ensure compliance with the emission limitation. ET- Compliance based upon Method 24 analyses and record keeping requirements. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
P002	7.3 Tons OC/yr	n	y	n	y	y	y	n	y	Other - Emission limitation established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. ET- Compliance based upon Method 24 analyses and record keeping requirements. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.

K001 and K002	30.08 lbs VOC/hr, 100.3 tons VOC/yr (coatings)	n	y	y	y	y	y	y	y	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. OR- Coating usage and VOC content restrictions to ensure compliance with the emission limitations. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
K001 and K002	6.0 tons VOC/yr (cleanup)	n	y	y	y	y	y	y	y	Other - Emission limitation established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. OR- Cleanup material usage restriction to ensure compliance with the emission limitation. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
K002	6.0 lbs VOC/hr, 19.71 tons VOC/yr (inks)	n	y	y	y	y	y	n	y	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. OR- Ink usage and VOC content restrictions to ensure compliance with the emission limitations. ET- Compliance based upon Method 24 analyses and record keeping requirements. Misc. - Term and condition which documents the results of the air modeling performed for PTI 01-7334 pursuant to Ohio EPA's Air Toxics Policy for the pollutants emitted from emissions units K001, K002, P001 and P002. The term and condition also clarifies what process changes will not be and what process changes may be considered a "modification" as defined in OAC rule 3745-31-01.
K001	None	21-09(F)	40 CFR Part 60, Subpart RR							The emission limitations from these rules are equal to or less stringent than the federally enforceable emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install.
K002	None	21-09(Y)	40 CFR Part 63, Subpart KK							These emissions units are exempt from the emission limitations specified in OAC rule 3745-21-09(Y) and 40 CFR Part 63, Subpart KK pursuant to the provisions specified in OAC rule 3745-21-09(Y)(2)(b) and 40 CFR Part 63.820(a)(3), respectively.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- 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.
- 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. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.