

# Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	Alpha Coatings	
Premise Number	03-74-01-0194	
Number of Non-insignificant Emissions Units	6	
What makes this facility a Title V facility?	HAP emissions	
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			The 'controlled' pollutant at this facility is particulate matter, for which the emissions units are not 'major'. CAM rule is therefore not currently applicable to this facility.

**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.

C     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 (3745- )	Other							
K001 K002 K003 K004 K005 R002	0.551 lbs/hr PE	17-11 (B)(1)		N	Y	Y	Y	Y	N	None
K001 K002 K003 K004 K005 R002	20% opacity	17-07 (A) (1-3)		N	Y	Y	Y	Y	N	None
K002 K003 K004	10 gal/day or less of coating	21-09 (U)(2) (e)		N	N	Y	Y	Y	Y	M - No monitoring requirements are necessary to show compliance. Misc - PTI modifications required for increases in emissions for these emissions units.
K001 K005	3.5 lb VOC per gallon	21-09 (U)(1) (c)		N	N	Y	Y	Y	N	M - No monitoring requirements are necessary to show compliance. NOTE: Permittee will need to show compliance by daily volume-weighted average.
R002	see OR in comments	21-07 (G)		Y	N	Y	Y	Y	N	OR - cannot use photochemically-reactive materials. M - No monitoring requirements are necessary to show compliance.

K001	62.4 lb/day OC	31-05								M - No monitoring requirements are necessary to show compliance. T - Recordkeeping mass balance requirements are sufficient to show compliance.
K002	86.1 lb/day OC									
K003	55.7 lb/day OC			N	N	Y	Y	N	N	
K004	71.4lb/day OC									
K005	50.4lb/day OC									
K003	5.57 lb/gal OC	31-05								M - No monitoring requirements are necessary to show compliance. T - Formulation data or US EPA Method 24 used to show compliance.
K004	7.14 lb/gal OC									
K005	5.04 lb/gal OC			N	N	Y	Y	N	N	
R002	2.53 lb/gal VOC									
R002	3.0 lb/hr VOC	31-05								M, R, Rp - The limit is based on the potential to emit for these emissions units; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY

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

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 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.

- C 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.