

## Statement of Basis For Title V Permit

Company Name	Andover Industries, BMPI	
Premise Number	02-04-00-0060	
Number of Non-insignificant Emissions Units	23	
What makes this facility a Title V facility?	OC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	

- **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 (3745- )	Other							
B003	0.060 lb/hr PM	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B003	0.26 tpy PM	N	Y	Y	Y	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B003	0.057 lb/hr CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, emissions testing will be performed.
B003, B004, P010	0.019 lb/MMBtu CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in these emissions units. ET - If required, emissions testing will be performed.
B003	0.25 tpy CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B003	0.42 lb/hr NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, emissions testing will be performed.
B003, B004, P010	0.14 lb/MMBtu NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in these emissions units. ET - If required, emissions testing will be performed.
B003	1.84 tpy NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B003, B004	0.020 lb/MMBtu PM	17-10(B)(1)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas in these emissions units. ET - If required, emissions testing will be performed.
B003, B004,	20% opacity	17-07(A)(1)	N	Y	Y	Y	Y	N	N	OR, M, R, Rp - The permittee shall burn only natural gas in these emissions units.

R117, R118, R119, R120, R121, R122, R123, R124, R125, R126, R129, R130, R131, R132, R133, R134, R135, R136	20% opacity	17-07(A)(1)	N	Y	Y	Y	Y	N	N	OR, M, R, Rp - A dry filtration system for the spray booths shall be used while the emissions units are in operation.
B004	0.040 lb/hr PM	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, emissions testing will be performed.
B004	0.18 tpy PM	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B004	0.038 lb/hr CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, emissions testing will be performed.
B004	0.17 tpy CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
B004	0.28 lb/hr NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit. ET - If required, emissions testing will be performed.
B004	1.23 tpy NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only natural gas in this emissions unit.
P007	3 lb/hr OC	21-07(G)(1)	N	N	Y	Y	Y	Y	N	
P007	15 lb/day OC	21-07(G)(1)	N	N	Y	Y	Y	N	N	
P007	2.73 tpy OC	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P008	3 lb/hr OC	21-07(G)(1)	N	N	Y	Y	Y	Y	N	
P008	15 lb/day OC	21-07(G)(1)	N	N	Y	Y	Y	N	N	
P008	2.73 tpy OC	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P010	21.2 lb/day OC	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall maintain a minimum average combustion temperature within the incinerator and shall not exceed the average maximum VOC concentration.

P010, R129, R130, R131, R132, R133, R134, R135, R136	OC capture efficiency of 100% by weight and a destruction efficiency of at least 92% by weight.	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall maintain a minimum average combustion temperature within the incinerator and shall not exceed the average maximum VOC concentration.
P010	0.060 lb/hr PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of PE. ET - If required, emissions testing will be performed.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.020 lb/MMBtu PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of PE. ET - If required, emissions testing will be performed.
P010	0.19 tpy PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of PE.
P010	0.057 lb/hr CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of CO emissions. ET - If required, emissions testing will be performed.
P010	0.019 lb/MMBtu CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of CO emissions. ET - If required, emissions testing will be performed.
P010	0.18 tpy CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of CO emissions.
P010	0.42 lb/hr NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of NOx emissions. ET - If required, emissions testing will be performed.
P010	0.14 lb/MMBtu NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of NOx emissions. ET - If required, emissions testing will be performed.
P010	1.31 tpy NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) M, R, Rp - None, small source of NOx emissions.
R117, R118, R119, R120	8.04 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The use of photochemically reactive materials in these emissions units is prohibited.

R117, R118, R119, R120, R121, R122, R123, R124, R125, R126	None	21-07(G)(2)	N	Y	Y	Y	Y	N	N	OR - The use of photochemically reactive materials in these emissions units is prohibited. M, R, Rp - Requirements needed to show that the emissions units are exempt from 3745-21-07 by not employing organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
R117, R118, R119, R120, R121, R122, R123, R124, R125, R126, R129, R130, R131, R132, R133, R134, R135, R136	0.551 lb/hr PM	17-11(B)(1)	N	Y	Y	Y	Y	N	N	OR - A dry filtration system for the spray booths shall be used while the emissions units are in operation. ET - If required, emissions testing will be performed.
R121	12.95 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The use of photochemically reactive materials in this emissions unit is prohibited.
R122	0.42 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The use of photochemically reactive materials in this emissions unit is prohibited.
R123, R124	9.96 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The use of photochemically reactive materials in these emissions units is prohibited.
R125, R126	10.01 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The use of photochemically reactive materials in these emissions units is prohibited.
R129	0.07 lb/day OC	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05(A)(3) OR - The permittee shall maintain a minimum average combustion temperature within the incinerator and shall not exceed the average maximum VOC concentration. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential of 0.007 inch of water, whenever the emissions unit is in operation.
R129	0.02 lb of OC per gallon of coating	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.12 lb/hr PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.

P010, R129, R130, R131, R132, R133, R134, R135, R136	0.020 lb/MMBtu PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.52 tpy PM	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.24 lb/hr CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.040 lb/MMBtu CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	1.05 tpy CO	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.72 lb/hr NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	0.12 lb/MMBtu NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) ET - If required, emissions testing will be performed. The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.
P010, R129, R130, R131, R132, R133, R134, R135, R136	3.15 tpy NOx	N	Y	N	N	N	N	N	N	Basis - OAC rule 3745-31-05(A)(3) The emissions limitation are for the combustion of fuel in the incinerator that serves emissions unit P010 and R129 - R136.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping 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 comments. 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, record keeping, 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.