

Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	Baja Marine Corporation
Premise Number	03-17-01-0027
Number of Non-insignificant Emissions Units	31
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	
142 tons per year OC emissions, from facility cleanup operations (paragraphs 1, 2, 3, and 5)	31-05 (A)(3)		Cleanup emissions are acetone, a non-VOC.
work practice standards (paragraph 4)	31-05 (A)(3)		Work practice standards require use of covers on containers, issuance of no more than 2.5 gallons of acetone per day for each employee working at any lay-up station, and maintaining a daily log of acetone issued.
NESHAP notifications (paragraph 6)		40 CFR 63 Subpart VVVV	Includes provision on reopening of Title V permit due to NESHAP promulgation.

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							
R001 thru R031	8 lb/hr OC, 40 lb/day OC (each)	21-07 (G)(2)		N	N	Y	Y	N	Y	M - No monitoring requirements are necessary to show compliance. ET - Emissions are based on monomer content and emission factor from FRP model. Monomer content is determined by formulation data or Method 311. Misc - Industry-wide emission factor information has changed for these operations. The company cannot comply with the original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
R001 thru R031	see OR in comments	21-07 (G)(2)		Y	N	Y	Y	N	N	OR - Cannot use photochemically-reactive cleanup materials. M - No monitoring requirements are necessary to show compliance. ET - None necessary due for this operational restriction.
R001 R002 R003 R004	5.74 ton/yr VOC (each)	31-05 (A)(3)		N	N	Y	Y	N	Y	M - No monitoring requirements are necessary to show compliance. ET - Emissions are based on monomer content and emission factor from FRP model. Monomer content is determined by formulation data or Method 311. Misc - Industry-wide emission factor information has changed for these operations. The company cannot comply with the original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
R005 thru R019	4.2 ton/yr OC (each)	31-05 (A)(3)		N	N	Y	Y	N	Y	M - No monitoring requirements are necessary to show compliance. ET - Emissions are based on monomer content and emission factor from FRP model. Monomer content is determined by formulation data or Method 311. Misc - Industry-wide emission factor information has changed for these operations. The company cannot comply with the original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
R005 thru R019	see OR in comments	31-05 (A)(3)		N	N	Y	Y	N	N	OR - Monomer content of resin shall not exceed 35%, OC content of catalyst shall not exceed 95%, and resin/catalyst usage shall not exceed 13.4 gal/hr, 67 gal/day, and 14,060 gal/yr (each emissions unit). M - No monitoring requirements are necessary to show compliance. ET - Monomer and OC contents are determined by formulation data or Method 311.
R020	1.92 ton/yr VOC	31-05 (A)(3)		N	N	Y	Y	N	Y	M - No monitoring requirements are necessary to show compliance. ET - Emissions are based on monomer content and emission factor from FRP model. Monomer content is determined by formulation data or Method 311. Misc - Industry-wide emission factor information has changed for these operations. The company cannot comply with the original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.

Part III (Requirements Within the State & Federally Enforceable Section)										
EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
R021	16.92 ton/yr VOC	31-05 (A)(3)		N	N	Y	Y	N	N	M - No monitoring requirements are necessary to show compliance. ET - Emissions are based on monomer content and emission factor from FRP model. Monomer content is determined by formulation data or Method 311.
R022 thru R031	see OR in comments	31-05 (A)(3)		N	N	Y	Y	N	N	OR - Monomer content of resin shall not exceed 30%, OC content of catalyst shall not exceed 95%, and resin/catalyst usage shall not exceed 14.2 gal/hr, 71 gal/day, and 24,866 gal/yr (each emissions unit). M - No monitoring requirements are necessary to show compliance. ET - Monomer and OC contents are determined by formulation data or Method 311.

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.