

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Monroe Clevite Elastomers - Napoleon, Ohio	
Premise Number	0335010108	
Number of Non-insignificant Emissions Units	16	
What makes this facility a Title V facility?	VOC and HAP's (methyl isobutyl ketone and xylene)	
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	
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 (3745- )	O t h e r							
K001 K002	6.11 (Chemlok 205) and 6.48 (Chemlok 252X) lbs VOC/ gallon minus water and exempt solvents	21-9(U)(1)(c)/ 21-09 (U)(2) (f)(ii)	N	N	Y	Y	Y	N	N	ET- No emissions testing required, compliance demonstrated through the recordkeeping/reporting requirements and material balance calculations. NOTE: Limit is calculated as a daily volume-weighted average.
K001 K002	0.551 lbs PE/hr	17-11 (B)	N	Y	Y	Y	Y	N	N	OR- Operation and maintenance requirements are required to minimize VOC emissions. ET- No emissions testing required, compliance demonstrated through the recordkeeping/reporting requirements and material balance calculations.
K001 K002	visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule	17-07 (A)	N	Y	Y	Y	Y	N	N	ET- No emissions testing required, compliance demonstrated through the recordkeeping/reporting requirements and material balance calculations.
L001- L012	none	21-09 (O)(4)	N	Y	N	Y	N	N	N	OR- Operation and maintenance requirements are required to minimize VOC emissions. — No monitoring requirements are necessary to show compliance. Rp- No limits are established pursuant to this rule. ET- No limits are established pursuant to this rule.
K003	Use of less than 10 gallons of coating per day	21-09 (U)(2) (e)	N	Y	Y	Y	Y	N	N	OR- The permittee is required not to employ any solvent to clean and remove soils from any metal part surfaces in this emissions unit.  ET- No emissions testing is required because compliance is demonstrated through recordkeeping/reporting requirements and material balance.
P002	none	21-07 (G)	N	Y	Y	Y	Y	N	N	OR- The Permittee is required to only use non-photochemically reactive materials. — No monitoring requirements are necessary to show compliance. ET- No limits are established pursuant to this rule.

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 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, 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.