

Statement of Basis For Title V Permit

Company Name	Clow Water Systems Company	
Premise Number	0616010006	
Number of Non-insignificant Emissions Units	25	
What makes this facility a Title V facility?	VOC and PM	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y	

Part II (State and Federally Enforceable Requirements)			
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							
F002	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F004	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F006	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F007	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F008	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F009	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F010	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F011	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F012	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F014	20% opacity	17-07		N	N	N	N	Y	N	
F014	12 lb/hr PM	17-11		N	N	N	N	Y	N	
F014	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08.
F014	None	21-07 (G) exempt		N	N	N	N	N	N	Source exempt per OAC 3745-21-07 (G) (9) (h).
F014	7.40 TPY VOC rolling 12-month sum		Y	N	Y	Y	Y	Y	N	Synthetic Minor Limitation per PTI # 06-5183 to avoid PSD
F015	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08

F016	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08
F017	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08
F018	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08
F019	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08
F020	None	17-08		N	N	N	N	N	N	Existing source not located in an Appendix A area as described in OAC rule 3745-17-08
K002	20% opacity	17-07		Y	Y	Y	Y	Y	N	
k002	0.551 lb/hr PM	17-11		Y	Y	Y	Y	Y	N	
K002	3.5 lb VOC/gal	21-09 (U) (1) (d)		N	Y	Y	Y	Y	N	
K005	3.5 lb VOC/gal	21-09 (U) (1) (d)		N	Y	Y	Y	Y	N	
K006	3.5 lb VOC/gal	21-09 (U) (1) (d)		N	Y	Y	Y	Y	N	
K006	1.91 lb/hr PM	17-11		Y	Y	Y	Y	Y	N	
K006	20 % opacity	17-07		Y	Y	Y	Y	Y	N	
K007	NPR materials	21-07 (G) exempt		N	Y	Y	Y	N	N	Source is exempt from requirements in 21-07 (G) due to the use of only non-photochemically reactive coatings.
K008	NPR materials	21-07 (G) exempt		N	Y	Y	Y	N	N	Source is exempt from requirements in 21-07 (G) due to the use of only non-photochemically reactive coatings.
K009	30 TPY VOC 12-month rolling sum		Y	Y	Y	Y	Y	Y	N	Synthetic Minor Limitation per PTI # 06-5183 to avoid PSD

K009	NPR materials	21-07 (G) exempt		N	Y	Y	Y	N	N	Source is exempt from requirements in 21-07 (G) due to the use of only non-photochemically reactive coatings
P020	None	17-11		N	Y	Y	Y	Y	N	Metal pipe charged does not emit particulates/natural gas fired - UMRE < 10lb/hr
P020	None	17-07		N	Y	Y	Y	Y	N	Metal pipe charged does not emit particulates/natural gas fired - UMRE < 10lb/hr
P033	0.020 lb PM/mBTU	17-10		Y	Y	Y	Y	N	N	
P033	20 % opacity	17-07		N	N	N	N	Y	N	
P901	50 lb/hr PM	17-11		N	Y	Y	Y	Y	N	
P901	1300 degree F 0.3 sec. RT	21-08		Y	Y	Y	Y	N	N	
P901	20% opacity	17-07		N	Y	Y	Y	Y	N	

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.