

Statement of Basis For Title V Permit

Part I - General	
Company Name	Decorative Panels, Inc.
Premise Number	0448011193
What makes this facility a Title V facility?	VOC & HAPs
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	K001 - Permit to Install 04-00204m1 establishes a LAER equivalency to the 1984 determination of 2.4 pounds of VOC per 1000 square feet of Class II hardboard produced as a monthly average, 5.33 pounds of VOC per 1000 square feet of Class I tileboard produced as a monthly average and 90 tons of VOC per 3-month period. The new equivalent LAER is 3.29 pounds of VOC per gallon of applied coating solids and 90 tons of VOC per rolling, 3-month period. No new emissions or process modification have occurred. The PTI and PTO are to be processed concurrently as per OEPA guidance. Added requirements for 40 CFR Part 63, Subparts A and QQQQ. Added authority citations. Added control efficiency and capture efficiency to required emission tests.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1		Y	Subpart QQQQ of 40 CFR Part 63 (Surface Coating of Wood Building Products) becomes applicable on the May 28, 2006 compliance date. The permittee has not identified their compliance option preferences.
NA		Y	40 CFR, Part 68 is no longer an applicable requirement for this facility due to the delisting of propane. B001 and B002 - These previously included emissions units have been removed from service effective 1/1/03.

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.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												

K001 - hardboard finishing line with eight thermal incinerators	Emissions of volatile organic compounds (VOC) shall not exceed 3.29 pounds per gallon of coating solids	31-21 thru 27	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - LAER determination of PTI 04-00204m1</p> <p>OR - A.II.2. OEPA standardized incinerator terms, A.II.3 was added to encourage ABT's extensive program to replace solvent based paints with water based equivalents. Some change or increase in odor levels is anticipated, so A.II.4 was added to require thermal incineration on a case by case basis for odor control.</p> <p>M, R, Rp - appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restrictions. Currently only one coating station utilizes solvent based coatings, no return to solvent based coatings is anticipated.</p> <p>ET - Stack testing has been performed regularly since the installation was completed, with the most recent testing in August of 2001. While one line, the coating operation takes place in several stages with separate drying ovens and incinerators. The process is largely enclosed and the building maintained under a negative pressure. Capture efficiency has been determined by mass balance based on the VOC content to the coating materials applied at each coating station. Provisions have been added to test incinerators which have been removed from service due to the exclusive substitution of low VOC, water-based coatings, in the unlikely event that the the coating station ever be returned to application of a solvent based coating.</p> <p>Misc. - A.VI.1. was added as a clarifying statement at ABT's request.</p>
	Emissions of VOC shall not exceed 90 tons as a rolling, 3-month summation	31-21 thru 27	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - Federal enforceability is assured based on record keeping of the total coating usage (as gallons of applied coating solids per rolling, 3-month period). CAM is applicable based on actual reported VOC emissions of 106.91 tons for calendar year 2003. CAM requirements are satisfied by testing requirements coupled with continuous incinerator temperature monitoring when utilizing non-compliant coatings and by monthly records of compliant coating usage during periods of the utilization of compliant coatings.</p>

85% overall (capture and control) destruction efficiency	21-07 (G), (G)(1), (G)(2)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - (G)(1) A person shall not discharge more than fifteen pounds of organic materials into the atmosphere in any one day, nor more than three pounds in any one hour, from any article, machine, equipment, or other contrivance in which any liquid organic material or substance containing liquid organic material comes into contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen, unless said discharge has been reduced by at least eighty-five per cent. (G)(2) A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance used under conditions other than described in paragraph (G)(1) of this rule for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material, unless said discharge has been reduced by at least eighty-five per cent. M,R,Rp&ET - requirements consistent with OEPA standardized terms and conditions for thermal incineration.
90% control device destruction efficiency	21-07 (G) (6)(a)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - (G)(6) Emission of organic materials into the atmosphere required to be controlled by paragraph (G)(1), (G)(2), or (G)(3) of this rule, shall be reduced by: (a) Incineration, provided that ninety per cent or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide. M,R,Rp&ET - requirements consistent with OEPA standardized terms and conditions for thermal incineration.
exemption	21-07 (G)(9) (c) & (d)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - (G)(9) The provisions of paragraph (G) shall not apply to: (c) The use of any material, in any article, machine, equipment, or other contrivance described in paragraph (G)(1), (G)(2), (G)(3), or (G)(4) of this rule, if: (i) The volatile content of such material consists only of water and liquid organic material, and (ii) The liquid organic material comprises not more than twenty per cent of said volatile content, and (iii) The volatile content is not a photochemically reactive material' or (d) The use of any material, in any article machine, equipment or other contrivance described in paragraph (G)(1), (G)(2), (G)(3) or (G)(4) of this rule, if: (i) The volatile content of such material does not exceed twenty per cent by volume of said material, and (ii) The volatile content is not a photochemically reactive material. M,R,Rp&ET - requirements consistent with demonstration that the coatings utilized comply with the exemption requirements..

	None	40 CFR Part 63 Subparts A and QQQQ	N	N	N	N	N	N	N	N	N	N	N	N	N	Basis - The compliance date for this facility is May 28, 2006. This MACT will establish a HAP emissions limitation of 1.53 pound per gallon of coating solids. This emissions limitation may be met thru the utilization of compliant coatings. Any non-compliant coatings will require the use of a thermal incinerator. Operating temperatures will be set at the temperature established during stack testing, and flow rate monitoring may apply. Operationally no substantial changes to the existing process are anticipated to meet compliance. The MACT terms were incorporated into this permit by reference in Part II to their attachment as a separate document.
Z001 - laminating line	None	15-05 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	N	Basis - this emissions unit meets the "de minimis" criteria established in OAC rule 3745-15-05. This emissions unit utilizes a modified polyvinyl acetate resin emulsion which is anticipated to have no quantifiable emissions of VOC.
Z002 - QC laboratory	None	15-05 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	N	Basis - this emissions unit meets the "de minimis" criteria established in OAC rule 3745-15-05
	exemption	31-03 (A)(1) (a).	N	Y	N	N	N	N	N	N	N	N	N	N	N	Basis - this emissions unit is also exempted from permitting requirements by OAC rule 3745-31-03(A)(1)(i).. Satisfaction of the terms for this exemption allows these laboratory and fume hoods used for chemical and physical analysis to qualify as insignificant sources by the definition of OAC rule 3745-77-01(U)(1).

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping 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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.

- 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. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.