

Statement of Basis For Title V Permit

Company Name	Dinagraphics		
Premise Number	1431370116		
What makes this facility a Title V facility?	VOC and HAPS		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.			
Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1		40 CFR Part 68	Requires the submittal of a risk management plan

<p>Emissions units K004-K007 are subject to the requirements of 40 CFR, Part 63, Subpart A and KK. The requirements of these Subparts are specified in Part II Section A.2.a. through Section A.7.b. of this permit.</p>		<p>40 CFR Part 63 Subpart KK</p>	<p>The permittee is complying with 40 CFR Part 63 Subpart KK. Therefore the OR, M, R, Rp, and ET are assumed to be adequate and require no further discussion as to their basis. A summary of the requirements spelled out in A.2.a through A.7.b is below.</p> <p>Emission units K004-K007 operate in permanent total enclosures with no natural draft openings and are vented to a common thermal oxidizer. The permittee operates a capture system and control device with an overall organic HAP control efficiency of at least 95 percent for each month to demonstrate compliance with the requirements of 40 CFR Part 63 Subpart KK.</p> <p>The permittee has performed the testing required by the initial compliance demonstration provisions of 40 CFR Part 63 Subpart KK.</p> <p>The permittee has demonstrated that the emissions unit is equipped with a permanent total enclosure with no natural draft openings. Thus, there is no relevant operating parameter to be monitored to demonstrate capture.</p> <p>Per 40 CFR 63.828(a)(5) the permittee previously submitted a plan to USEPA which stated there was no relevant operating parameter to monitor to demonstrate capture. The permittee is following this plan since no comments were received from USEPA [40 CFR 63.828(a)(5)(iii)].</p> <p>The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, is required to be not be less 1500 degrees Fahrenheit or the temperature established as part of the most recent Notification of Compliance Status Report submitted pursuant to 40 CFR, Part 63, Subpart KK. The permittee continually collects and records the combustion temperature within the thermal oxidizer for all 3-hour blocks the emission units are in operation.</p> <p>The permittee is required to submit an "excess emissions and continuous monitoring system performance report" and/or a "summary report" semi-annually for emission units K004-K007.</p> <p>Emission testing for compliance with the 95 capture and control efficiency for the combined operation of K004, K005, K006, ad K007 is required. Testing is required to be conducted within six months of the startup of K007, or within 2.5 years of final Title V permit issuance, whichever is sooner.</p> <p>The OR, M, Rp, and R for the Start up, Shut down, and Malfunction plan (SSM) requirements are spelled out in Sections A.2.a. through A.7.b.</p>
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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 & 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	Comments
		SIP (3745-)	Other												
K004 - K007	95% capture and control for VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-The permittee is required to maintain the temperature within the combustion chamber of the thermal oxidizer at the same temperature recorded during the most recent stack test that demonstrated the emission unit to be in compliance. This approach is consistent with 40 CFR Part 63 KK and is assumed to be adequate.</p> <p>OR-The permittee is required to maintain a permanent total enclosure with no natural draft openings.</p> <p>M&R-The permittee maintains a continuous temperature monitor for the thermal oxidizer and records all 3-hour average temperature blocks. This approach is consistent with 40 CFR Part 63 KK and is assumed to be adequate.</p> <p>M&R-The are no relevant operating parameters for permanent total enclosures with no natural draft openings.</p> <p>Rp- Quarterly reports providing compliance summaries for the temperature restrictions are required. This approach is consistent with 40 CFR Part 63 KK and is assumed to be adequate.</p> <p>ET-Emission testing to demonstrate compliance with the requirement to control 95% of the VOC and HAPs is required every 2 ½ years.</p> <p>CAM is not applicable.</p>

K004-K007	95% capture and control for HAPs		40 CFR Part 63 Subpart KK	N	Y	Y	N	Y	Y	N	Y	N	Y	N	The OR, M, R, Rp, and ET for emission units complying with 40 CFR Part 63 Subpart KK by use of a permanent total enclosure and a thermal oxidizer capable of achieving a 95% capture and control efficiency is spelled out in Part II Section A.2.a. through Section A.7.b. of this permit. These requirements are assumed to be adequate. CAM is not applicable.
K004	25 TPY of VOC	31-05 (D)		N	Y	Y	N	Y	Y	N	Y	N	Y	N	OR-The maximum annual VOC input is limited to 1,000,000 pounds. This input when multiplied by the 95% capture and control efficiency requirement limits the VOC emissions from this emission unit to 25 TPY. M&R-The permittee is required to collect and record the total VOC inputs for coatings and cleanup materials on a monthly basis. These totals are adequate to show compliance with the VOC input limit and therefore the VOC emission limit. Rp-Deviation reports for exceedances of the VOC input limit are required. ET-Emission testing to ensure the 95 % capture and control efficiency is being achieved is required.

K005	60 TPY of VOC	31-05 (D)		N	Y	Y	N	Y	Y	N	Y	N	Y	N	<p>OR-The maximum annual VOC input is limited to 2,400,000 pounds. This input when multiplied by the 95% capture and control efficiency requirement limits the VOC emissions from this emission unit to 25 TPY.</p> <p>M&R-The permittee is required to collect and record the total VOC inputs for coatings and cleanup materials on a monthly basis. These totals are adequate to show compliance with the VOC input limit and therefore the VOC emission limit.</p> <p>Rp-Deviation reports for exceedances of the VOC input limit are required.</p> <p>ET-Emission testing to ensure the 95 % capture and control efficiency is being achieved is required.</p>
K006	74 TPY of VOC	31-05 (D)		N	Y	Y	N	Y	Y	N	Y	N	Y	N	<p>OR-The maximum annual VOC input is limited to 2,960,000 pounds. This input when multiplied by the 95% capture and control efficiency requirement limits the VOC emissions from this emission unit to 25 TPY.</p> <p>M&R-The permittee is required to collect and record the total VOC inputs for coatings and cleanup materials on a monthly basis. These totals are adequate to show compliance with the VOC input limit and therefore the VOC emission limit.</p> <p>Rp-Deviation reports for exceedances of the VOC input limit are required.</p> <p>ET-Emission testing to ensure the 95 % capture and control efficiency is being achieved is required.</p>

K007	25 TPY of VOC	31-05 (D)		N	Y	Y	N	Y	Y	N	Y	N	Y	N	OR-The maximum annual VOC input is limited to 1,000,000 pounds. This input when multiplied by the 95% capture and control efficiency requirement limits the VOC emissions from this emission unit to 25 TPY. M&R-The permittee is required to collect and record the total VOC inputs for coatings and cleanup materials on a monthly basis. These totals are adequate to show compliance with the VOC input limit and therefore the VOC emission limit. Rp-Deviation reports for exceedances of the VOC input limit are required. ET-Emission testing to ensure the 95 % capture and control efficiency is being achieved is required.
K004-K007	See comment section	21-09(Y)(1)(b)													The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 63, Subpart KK.

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.
4. 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.