

Statement of Basis For Title V Permit

Company Name	Florida Production Engineering		
Premise Number	0165010087		
Number of Non-insignificant Emissions Units	9		
What makes this facility a Title V facility?	Single HAP (Methyl ethyl ketone)		
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	
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-)	Other							
R001-R008	8 lb OC/hr and 40 lb OC/day when using PRM	21-07 (G)(2)		N	N	Y	Y	N	N	<p>OR: No operational restrictions are necessary to show compliance.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of coating and cleanup ID, number of gallons employed, OC content, total OC emission rate of coatings and cleanup PRMs, hours of operation, total OC emission rate for nonPRM cleanup materials when coating PRMs are, total OC emission rate for cleanup PRMs when coating PRMs are used.</p> <p>Rp: Submittal of excursion reports of 8 lb OC/hr and 40 lb OC/day when coating PRMs are used.</p> <p>ET: No testing is required and compliance is determined through record keeping.</p> <p>Misc: No miscellaneous requirements are needed.</p>
R001-R008	12 lb OC/hr when using nonPRMs	Syn Minor	31-05 (A)(3) (01-6841)	N	N	Y	Y	N	N	<p>OR: No operational restrictions are necessary to show compliance.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of coating and cleanup ID, number of gallons employed, OC content, hours of operation, the OC emission rate for coating and cleanup when nonPRM coatings are used, the hourly average OC emission rate for when nonPRM coatings and any cleanup are used.</p> <p>Rp: Submittal of excursion reports of 12 lb OC/hr limitation.</p> <p>ET: No testing is required and compliance is determined through record keeping.</p> <p>Misc: No miscellaneous requirements are needed.</p>

R001-R008	53 tons OC/yr	Syn Minor	31-05 (A)(3) (01-6841)	N	N	Y	Y	N	N	<p>OR: No operational restrictions are necessary to show compliance.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of coating and cleanup ID, number of gallons employed, OC content, total OC emission rate of coatings and cleanup PRMs, hours of operation, total OC emission rate for nonPRM cleanup materials when coating PRMs are used, total OC emission rate for PRM cleanup materials used when coating PRMs are used, the OC emission rate for coating and cleanup when nonPRMs are used. Record keeping shall also include monthly records of the total coating usage, average OC content of coatings, cleanup usage rate, average OC content of cleanup, OC emission rate for coatings and cleanup, annual OC emission rate for coatings and cleanup.</p> <p>Rp: Submittal of excursion reports of the 53 tons OC/yr limitation.</p> <p>ET: No testing is required and compliance is determined through record keeping.</p> <p>Misc: No miscellaneous requirements are needed.</p>
R001-R008	0.06 lb PM/hr and 0.25 ton PM/yr	Syn Minor	31-05 (A)(3) (01-6841)	Y	N	Y	Y	N	N	<p>OR: Emission units shall use high volume low pressure spray guns and shall operate PM filtration system during operation of unit.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of when PM filtration system was not in service and unit was operating.</p> <p>Rp: Notification within 30 days of when unit operated without PM filtration.</p> <p>ET: No testing is required due to the hourly worst case emission calculation.</p> <p>Misc: No miscellaneous requirements are needed.</p>
R001-R008	Compliance with Ohio's Air Toxic Policy	Syn Minor	31-05 (A)(3) (01-6841)	N	N	N	N	N	N	<p>OR: No operational requirements are necessary to show compliance.</p> <p>M: No Monitoring requirements are necessary due to original application submittal.</p> <p>R: No record keeping is necessary to due to original application submittal.</p> <p>Rp: No reporting is necessary to due to original application submittal.</p> <p>ET: No testing is necessary to due to original application submittal.</p> <p>Misc: No miscellaneous requirements are needed.</p>

R001-R008, R010	100 tons OC/rolling 12-month period from R001-R008, R010	Syn Minor	31-05 (D) (01-6841)	Y	N	Y	Y	N	N	<p>OR: Units R001-R008 shall not use greater than 33,600 gallons of coatings per year.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of coating and cleanup ID, number of gallons employed, OC content, total OC emission rate of coatings and cleanup PRMs, hours of operation, total OC emission rate for nonPRM cleanup materials when coating PRMs are used, total OC emission rate for cleanup PRMs used when coating PRMs are used, the OC emission rate for coating and cleanup when nonPRMs are used, Record keeping shall also include monthly records of the total coating usage, average OC content of coatings, cleanup usage rate, average OC content of cleanup, rolling 12-month summation of coating usage, OC emission rate for coatings and cleanup, rolling 12-month summation of OC emission rate for coatings and cleanup.</p> <p>Rp: Submittal of excursion reports of the 100 tons OC/rolling 12-month period and 33,600 gal/yr limitations for R001-R008 and R010.</p> <p>ET: No testing is required and compliance is determined through record keeping.</p> <p>Misc: No miscellaneous requirements are needed.</p>
R001-R008	6.25 lb/gal of coatings in R001-R008 as a monthly average	Syn Minor	31-05 (D) (01-6841)	N	N	Y	Y	N	N	<p>OR: No operational restrictions are necessary to show compliance.</p> <p>M: No Monitoring requirements are not necessary due to record keeping.</p> <p>R: Record keeping shall include daily record of coating and cleanup ID, number of gallons employed, OC content, hours of operation, monthly records of the total coating usage, average OC content of coatings, average monthly OC emission rate for coatings.</p> <p>Rp: Submittal of excursion reports of the 6.25 lbs OC/gallon of coating limitation for R001-R008.</p> <p>ET: No testing is required and compliance is determined through recordkeeping.</p> <p>Misc: No miscellaneous requirements are needed.</p>

R001-R008	VE shall not exceed 20% opacity as a 6 minute average	17-07 (A)		Y	N	Y	Y	Y	N	OR: Emission units shall use PM filtration system during operation of unit. M: No Monitoring requirements are not necessary due to record keeping. R: Record keeping shall include daily record of when PM filtration system was not in service and unit was operating. Rp: Notification within 30 days of when unit operated without PM filtration. ET: Compliance determined through 40 CFR Part 60, Appendix A, Method 9 and procedures specified in OAC rule 3745-17-03 (B)(1). Misc: No miscellaneous requirements are needed.
R001-R008	less stringent than 31-05 (A)(3) above	17-11 (B)(1)		N	N	N	N	N	N	Compliance established through compliance with 31-05 (A)(3).
R010	4.3 lb OC/hr and 18 tons OC/yr	Syn Minor	31-05 (D) (01-6841)	Y	N	Y	Y	Y	N	OR: No PRMs shall be used in this unit.. M: No Monitoring requirements are not necessary due to record keeping. R: Record keeping shall include daily record of cleanup ID, number of gallons employed, PRM or nonPRM, OC content, OC emission rate, hours of operation, average hourly OC emission rate. In addition, record keeping shall include monthly record of the total OC emission rate, the annual OC emission rate. Rp: Submittal of excursion reports of the 4.3 lb OC/hr limitation, 18 tons OC/yr limitation and the use of PRMs. ET: No testing is required and compliance is determined through record keeping. Misc: No miscellaneous requirements are needed.
P001	12 lbs OC/hr and 53 tons/yr		31-05 (D) (01-6841)	N	N	N	N	N	N	The organic compound emissions from this emissions unit have already been accounted for in the associated spray coating operations (emissions units R005-R008) for the purpose of determining compliance with the applicable emission limitations established pursuant to OAC rule 3745-31-05.

For clarification purposes:

31-05 (D) is cited for units R001-R008 and R010 because these units were previously permitted in a Synthetic Minor permit to avoid the cost effectiveness of additional control equipment.

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.