

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Formica Corporation		
Premise Number	1431150801		
Number of Non-insignificant Emissions Units	19		
What makes this facility a Title V facility?	VOC		
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	

- **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		O R	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001, K002, K006, and K011	2.9 lbs VOC per gallon of coating, excluding water and exempt solvents	21-09(F)	N	N	Y	Y	Y	Y	N	
K006 and K014	The total combined VOC emissions from emissions units K006 and K014 shall not exceed 115.8 TPY VOC based on a rolling, twelve-month summation	31-05(A)(3)	N	N	Y	Y	Y	N	N	ET. No testing required to demonstrate compliance.
K013	234 lbs VOC/hr from coatings 38.77 TPY VOC based on a rolling 12-month summation lb/MMBtu and TPY emission limitationss from the burning of natural gas in the curing oven	31-05(A)(3)	N	N	Y/ N	Y	Y	N	N	M. No monitoring required to demonstrate compliance with the lbs VOC/hr and emissions from the burning of natural gas since these emission limitations are set at the emissions unit's potential to emit. ET. No testing required to demonstrate compliance; however, if required, the permittee shall demonstrate compliance with the lbs VOC/hr emission limitation through approved U.S. EPA test methods.

K014	11.0 lbs VOC/hr from coatings lb/MMBtu and TPY emission limitations from the burning of natural gas in the curing oven and incinerator Use of a permanent total enclosure and a thermal oxidizer Minimum overall control efficiency of 99%.	31-05(A)(3)	N	Y	Y/N	Y	Y	Y	Y	Y	M. No monitoring required to demonstrate compliance with the lbs VOC/hr and emissions from the burning of natural gas since these emission limitations are set at the emissions unit's potential to emit.
K003, K004, K005, and K013	The VOC content as applied, of each coating employed shall not exceed 0.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.	21-09 (PP)	N	N	Y	Y	Y	Y	Y	N	ET. Method 24 shall be used to determine compliance with the VOC content limitation.
Z018, Z019, and Z021	20% opacity	17-07(A)	N	Y	Y	Y	Y	Y	Y	N	OR. Particulate emissions shall be vented to a cyclone.
Z020, Z022, Z030, Z031, Z032, Z033, and Z034	20% opacity	17-07(A)	N	Y	Y	Y	Y	Y	Y	N	OR. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.

Z018, Z019, and Z020	9.51 lbs PE/hr	17- 11(B)	N	Y	Y	Y	Y	Y	N	OR. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.
Z030, Z031, and Z032	9.01 lbs PM/hr	17- 11(B)	N	Y	Y	Y	Y	Y	N	OR. The pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation.
Z021, Z033	1.2 lbs PM/hr, 5.27 TPY PM, 0.9 lb PM10/hr, 3.94 TPY PM10	31- 05(A)(3)	N	Y	Y	Y	Y	Y	N	OR. Particulate emissions shall be vented to a cyclone(s) - Z021 and the pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation - Z033.
Z022, Z034	0.083 lb PM/hr, 0.37 TPY PM, 0.027 lb PM10/hr, 0.12 TPY PM10	31- 05(A)(3)	N	Y	Y	Y	Y	Y	N	OR. Particulate emissions shall be vented to a cyclone(s) - Z022 and the pressure drop across the baghouse shall be maintained within the range of 3-6 inches of water while the emissions unit is in operation - Z033.

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.