

# Statement of Basis For Title V Permit

Company Name	Franklin International	
Premise Number	01-25-04-0070	
What makes this facility a Title V facility?	Potential to emit OCs and major source under Section 112 of the Act	
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.		

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
MACT hammer language for			
Subpart FFFF and	N	Y	Subpart FFFF starting at 63.2430, for their resin, caulk, or other products made in the reactors
Subpart HHHHH	N	Y	Subpart HHHHH starting at 63.7980, for their adhesive mixers

▼ **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		N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
		SIP (3745- )	Other												
P002, P003, P020, P021, P022, P023, P024, P026, P027, P028, P041,  P103, P104, P113, P114, P128	Visible emissions shall not exceed 20% opacity as a 3-minute average, for fugitive dust	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- the lid to the mixer or pre-emulsion tank is closed after materials are added and bags disposed are of in closed container M- monitor through daily visible emission checks R- records of visible emissions in daily log Rp-semiannual reports for visible emissions ET-if required, Method 9 shall be employed to demonstrate compliance (from building doors/vents). This is for fugitive emissions from the addition of dry materials to the mixer and pre-emulsion tanks.
P004, P005, P006, P007, P029, P030, P031, P039, P040,  P106, P107, P115, P116, P124, P125, P127	No visible emissions from building doors/vents	N	31-05(A)(3) PTIs: 01-5686, 01-6087, 01-8401, 01-6304, 01-5683, 01-8402, 01-5232, 01-6303, 01-8188	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- the lid to the mixer or pre-emulsion tank is closed after materials are added and bags disposed are of in closed container M- monitor through daily visible emission checks R- records of visible emissions in daily log Rp-semiannual reports for visible emissions ET-if required, Method 9 shall be employed to demonstrate compliance (from building doors/vents). This is for fugitive emissions from the addition of dry materials to the mixer and pre-emulsion tanks.  All from PTI-more restrictive than 17-07(B)

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
		SIP (3745-)	Other												
P002, P003, P004, P005, P006, P007, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P039, P040, P041,  P103, P104, P106, P107, P113, P114, P115, P116, P124, P125, P127, P128	RACM	17-08(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- the lid to the mixer or pre-emulsion tank must be closed after materials are added; and bags disposed are of in closed container M- monitor through daily visible emission checks R- records of visible emissions in daily log Rp-semiannual reports for visible emissions ET-if required, Method 9 from building doors & vents

P103, P104, P113, P114, P128  P106, P107, P115, P116, P124, P125, P127	OC not to exceed 3 lbs/hr and 15 lbs/day unless emissions reduced by 85%	21-07(G)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor and condenser R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits &/or % control  ET-stack test either the lb/hr emissions or 85% control
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EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
		SIP (3745-)	Other												
P002, P003, P006 P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031	OC not to exceed 8 lbs/hr and 40 lbs/day unless emissions reduced by 85%	21-07(G)(2)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements for condenser control if used to demonstrate compliance</p> <p>M-continuous temp. monitoring of mixer and condenser, if condenser installed or if used to demonstrate compliance</p> <p>R-computer record of continuous temp. monitoring if condenser installed or if used to demonstrate compliance, # of batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations (if control applied and condenser installed), exceedance of emission limits &amp;/or % control</p> <p>ET-stack test either the lb/hr emissions or for 85% control</p> <p>No condenser on P002,P003,P020,P021,P024,P026</p>
P039, P040	OC not to exceed 8 lbs/hr and 40	N	31-05(A)(3), PTI#01-6087	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements and temp restrictions for condenser control if used to calculate emissions</p> <p>M-continuous temp. monitoring of mixer and condenser</p> <p>R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits</p> <p>ET-stack test lb/hr emissions</p> <p>All from PTI-more restrictive than 21-07(G)(2)</p>
P004	OC not to exceed 6.5 lbs/hr and 32.6 lbs/day	N	31-05(A)(3), PTI#01-5686	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements and temp restrictions for condenser control if used to calculate emissions</p> <p>M-continuous temp. monitoring of mixer and condenser</p> <p>R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits</p> <p>ET-stack test lb/hr emissions</p> <p>All from PTI-more restrictive than 21-07(G)(2)</p>

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
		SIP (3745- )	Other												
P005	OC not to exceed 6.4 lbs/hr and 31.9 lbs/day	N	31-05(A)(3), PTI#01-5686	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements and temp restrictions for condenser control if used to calculate emissions</p> <p>M-continuous temp. monitoring of mixer and condenser</p> <p>R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits</p> <p>ET-stack test lb/hr emissions</p> <p>All from PTI-more restrictive than 21-07(G)(2)</p>
P007	OC not to exceed 7.7 lbs/hr and 38.5 lbs/day	N	31-05(A)(3), PTI#01-6087	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements and temp restrictions for condenser control if used to calculate emissions</p> <p>M-continuous temp. monitoring of mixer and condenser</p> <p>R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits</p> <p>ET-stack test lb/hr emissions</p> <p>All from PTI-more restrictive than 21-07(G)(2)</p>
P041	OC not to exceed 3.8 lbs/hr and 18.8 lbs/day	N	31-05(A)(3), PTI#01-6304	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR-temperature monitoring requirements and temp restrictions for condenser control if used to calculate emissions</p> <p>M-continuous temp. monitoring of mixer and condenser</p> <p>R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions</p> <p>Rp-quarterly reporting of condenser temp deviations, and/or exceedances of emission limits</p> <p>ET-stack test lb/hr emissions</p> <p>All from PTI-more restrictive than 21-07(G)(2)</p>

EU(s)	Limitation	SIP	Other	N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
P106, P107, P116	OC not to exceed 6.5 lbs/hr and 32.3 lbs/day after emissions are reduced by 85%	N	31-05(A)(3), PTI#01-5683	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and exceedances of emission limits & % control ET-stack test the lb/hr emissions & 85% control  All from PTI
P115	OC not to exceed 7.3 lbs/hr and 32.3 lbs/day after emissions are reduced by 85%	N	31-05(A)(3), PTI#01-8402	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and exceedances of emission limits & % control ET-stack test the lb/hr emissions & 85% control  All from PTI
P124	OC not to exceed 4.38 lbs/hr and 21.92 lbs/day after emissions are reduced by 85%	N	31-05(A)(3), PTI#01-5232	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and exceedances of emission limits & % control ET-stack test the lb/hr emissions & 85% control  All from PTI

EU(s)	Limitation	SIP	Other	N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	Comments
P125	OC not to exceed 7.8 lbs/hr and 39.0 lbs/day after emissions are reduced by 85%	N	31-05(A)(3), PTI #01-6303	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and exceedances of emission limits & % control ET-stack test the lb/hr emissions & 85% control  All from PTI
P127	OC not to exceed 6.92 lbs/hr and 32.3 lbs/day after emissions are reduced by 85%	N	31-05(A)(3), PTI #01-8188	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature monitoring requirements for condenser control M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring, # batches made, emissions calculations, summation of emissions Rp-quarterly reporting of condenser temp deviations, and exceedances of emission limits & % control ET-stack test the lb/hr emissions & 85% control  All from PTI
P006, P007, P029, P030, P031, P039, P040, P041, P115, P127	OC not to exceed 7.0 tons/yr for P007; 7.3 tons/yr for P006, P039, P040, P041, P115, & P006; 3.4 tons/yr for P041; 5.9 tons/yr for P115 & P127	N	31-05(A)(3), PTIs: #01-6087, #01-6304, #01-8401, #01-8402, #01-8188	N	N	N	N	N	Y	N	Y	N	N	N	OR- none for TPY limit M- none for TPY limit R-computer record of # batches made, summation of daily or quarterly emissions Rp-Fee Emission Report of annual emissions ET-none for TPY limit  All from PTI

EU(s)	Limitation	SIP	Other	N D	O R	M	St	E N F	R	St	Rp	St	ET	Mis c	
P106, P107, P115, P116, P124, P125, P127	reactor condenser exhaust gases not to exceed average of 34.9 degrees Celsius; chilled water to pre- emulsion tank not exceed 17 degrees Celsius	N	31- 05(A)(3), PTIs: #01-5683, #01-8402, #01-5232, #01-6303, #01-8188	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-temperature restrictions for condenser control and chilled water M-continuous temp. monitoring of reactor, condenser, and chilled water R-computer record of continuous temp. monitoring of reactor, chilled water, and condenser exhaust gases Rp-quarterly reporting of reactor, chiller water, and condenser temp deviations, and exceedances of these temp. restrictions ET-continuous temperature monitoring & computer record of reactor, chilled water, and condenser gas exhaust; to be recorded during stack testing  All from PTI

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

▼ **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 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.