

Statement of Basis For Title V Permit

Company Name	Hedstrom Corporation	
Premise Number	03 03 01 0045	
What makes this facility a Title V facility?	VOC Emissions	
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.	no	

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.

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												
P021	0.01 gr PE/dscf 0.39 lb PE/hr 1.71 tons PE/yr No Visible emissions from the baghouse exhaust	31- 05(A)(3)	y	n	y	y	n	n	y	n	y	n	n	n	Other- 3745-31-05 All requirements transferred from PTI. OR-pressure drop across the baghouse must be maintained with in the range of 0.5-4" of water while EU is in operation. M- baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. R-Daily was chosen as a reasonable and practical monitoring frequency. Rp-pressure drop deviation reporting identifying all periods of time during which the pressure drop across the baghouse did not comply with the allowable range. ET-compliance demonstrated from the manufacturer's guaranteed maximum outlet grain loading concentration for this EU.
P021	none	17-11 (B)	n	y	y	n	n	n	y	n	y	n	n	n	ND-emission limitation specified by this rule is less stringent than the emission limitation established in 3745-31-05 (A)(3). OR-pressure drop across the baghouse must be maintained with in the range of 0.5-4" of water while EU is in operation. M- baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. R-Daily was chosen as a reasonable and practical monitoring frequency. Rp-pressure drop deviation reporting identifying all periods of time during which the pressure drop across the baghouse did not comply with the allowable range. ET-compliance demonstrated from the manufacturer's guaranteed maximum outlet grain loading concentration for this EU.

P021	none	17-07 (A)	n	y	y	n	n	n	y	n	y	n	n	n	ND-emission limitation specified by this rule is less stringent than the emission limitation established in 3745-31-05 (A)(3). OR-pressure drop across the baghouse must be maintained with in the range of 0.5-4" of water while EU is in operation. M- baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. R-Daily was chosen as a reasonable and practical monitoring frequency. Rp-pressure drop deviation reporting identifying all periods of time during which the pressure drop across the baghouse did not comply with the allowable range. ET-compliance demonstrated from the manufacturer's guaranteed maximum outlet grain loading concentration for this EU.
R005	8 lbs OC/hr 40 lbs OC/day	21-07 (G)(2)	n	n	n	n	n	n	y	n	y	n	n	n	OR-the requirements of 3745-21-07(G)(2) limit operation to 8&40. R-daily recordkeeping for coatings will demonstrate compliance with the limitaions. Rp-showing days the EU exceeded the 8&40 limit. ET-compliance demonstrated through the 8&40 limitation, and recordkeeping and reporting requirements.
R005	none	17-11(A)	n	y	n	n	n	n	n	n	n	n	n	n	ND-17-11(A) not applicable pursuant to 17-11(A)(2)(a)(ii).. R-daily recordkeeping for coatings will demonstrate compliance with the limitaions. Rp-showing days the EU exceeded the 8&40 limit. ET-compliance demonstrated through the 8&40 limitation, and recordkeeping and reporting requirements.
R005	none	17-07(A)	n	y	n	n	n	n	n	n	n	n	n	n	ND-17-07 is not applicable because 17-11 does not apply. R-daily recordkeeping for coatings will demonstrate compliance with the limitaions. Rp-showing days the EU exceeded the 8&40 limit. ET-compliance demonstrated through the 8&40 limitation, and recordkeeping and reporting requirements.

R006 R007 R008 R009	none	21-07(G)	n	n	y	y	n	n	y	n	n	n	n	n	21-07(G)-not a new source. OR-cannot employ any coating or cleanup materials in this EU that is a photochemically reactive material-demonstrates compliance with 21-07(G). M,R-daily recordkeeping, demonstrates compliance. Rp-any daily record showing use of any noncomplying material, 45 days after exceedance occurs. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.
R006 R007 R008 R009	none	17-11(A)	n	y	n	n	n	n	n	n	n	n	n	n	ND-17-11(A) not applicable pursuant to 17-11(A)(2)(a)(ii). ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements. OR, M,R,Rp-done through the 21-07 rule
R006 R007 R008 R009	none	17-07(A)	n	y	n	n	n	n	n	n	n	n	n	n	ND-17-07(A) is not applicable because 17-11 does not apply. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements. OR, M,R,Rp-done through the 21-07 rule
R031 R032	0.1 lb PE/hr	31-05(A)(3)	n	y	y	y	n	n	y	n	y	n	n	n	ND-the requirements established by this rule are equivalent to the requirements of 21-07(G)(2). OR-must operate dry filtration system whenever EU is in operation. M,R,RP-compliance shown thru quarterly reporting on coating usage, and thru monitoring and recordkeeping on coatings used and if dry filtration system was running while EU was in operation. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.

R031 R032	8.0lbsOC/hr 40lbsOC/day	21-07(G)(2)	n	y	y	y	n	n	y	n	y	n	n	n	ND-the requirements established by this rule are equivalent to the requirements of 21-07(G)(2). OR-must operate dry filtration system whenever EU is in operation. M,R,RP-compliance shown thru quarterly reporting on coating usage, and thru monitoring and recordkeeping on coatings used and if dry filtration system was running while EU was in operation. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.
R031 R032	20% opacity	17-07(A)	n	n	n	n	n	n	n	n	n	n	n	n	ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.
R031 R032	none	17-11(B)(2)	n	n	n	n	n	n	n	n	n	n	n	n	ND-the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 31-05
R033 R034	7.60 tons OC/yr (includes cleanup material)	31-05 (A)(3)	n	y	y	y	n	n	y	n	y	n	n	n	ND-the requirements established by this rule are equivalent to the requirements of 21-07(G)(2). OR-must operate dry filtration system whenever EU is in operation. Cannot employ any cleanup materials in this EU that is a photochemically reactive material. M,R,RP-compliance shown thru quarterly reporting on coating usage, and thru monitoring and recordkeeping on coatings used and if dry filtration system was running while EU was in operation. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.

R033 R034	8.0 lbs OC/hr & 40.0 lbs OC/day	21-07 (G)(2)	n	y	y	y	n	n	y	n	y	n	n	n	ND-the requirements established by this rule are equivalent to the requirements of 21-07(G)(2). OR-must operate dry filtration system whenever EU is in operation. Cannot employ any cleanup materials in this EU that is a photochemically reactive material. M,R,RP-compliance shown thru quarterly reporting on coating usage, and thru monitoring and recordkeeping on coatings used and if dry filtration system was running while EU was in operation. ET-compliance demonstrated through operation restriction, monitoring, recordkeeping and reporting requirements.
R033 R034	none	17-11 (A)	n	n	n	n	n	n	n	n	n	n	n	n	ND-the UMRE of PE emissions is less than 10 lbs/hr. Therefore, pursuant to 17-11(A)(2)(ii), this EU is exempt from the requirements of 17-11(B)(2).
R033 R034	none	17-07(A)	n	n	n	n	n	n	n	n	n	n	n	n	ND-this EU is exempt from the VE particulate emission limitations specified in 17-07 (A) pursuant to 17-07(A)(3)(h) b/c 17-11 is not applicable.
R035 R036	11.61 lbs OC/hr, 30.0 TPY OC- coating operations & 210.75 lbs OC/month, 1.26 TPY OC-cleanup operations	31-05 (A)(3)	n	n	y	y	n	n	y	n	y	n	n	n	OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation. R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed. and if dry filtration system was running while EU was in operation. ET-Compliance determined based upon the required recordkeeping requirements.

R035 R036	none	21-07(G)(2)	n	y	y	y	n	y	n	y	n	n	n	n	<p>ND-the permittee shall not employ any coating or cleanup material in this EU that is a photochemically reactive material.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed. and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>
R035 R036	none	17-11(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-the UMRE of PE emissions is less than 10 lbs/hr. Therefore, pursuant to 17-11(A)(2)(ii), this EU is exempt from the requirements of 17-11(B)(2).</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed. and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>

R035 R036	none	17-07(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-this EU is exempt from the VE particulate emission limitations specified in 17-07 (A) pursuant to 17-07(A)(3)(h) b/c 17-11 is not applicable.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed. and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>
R038	3.69 lbs OC/hr, 13.28 TPY OC-coating ops & 140.5 lbs OC/month, 0.85 TPY-cleanup ops	31-05 (A)(3)	n	n	y	y	n	n	y	n	y	n	n	n	<p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>

R038	none	21-07(G)(2)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-the permittee shall not employ any coating or cleanup material in this EU that is a photochemically reactive material.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>
R038	none	17-11(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-the UMRE of PE emissions is less than 10 lbs/hr. Therefore, pursuant to 17-11(A)(2)(ii), this EU is exempt from the requirements of 17-11(B)(2).</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>

R038	none	17-07(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-this EU is exempt from the VE particulate emission limitations specified in 17-07 (A) pursuant to 17-07(A)(3)(h) b/c 17-11 is not applicable.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements.</p>
R039	4.64 lbs OC/hr, 20.32 TPY-coating ops & 140.5 lbs OC/month, 0.84 TPY-cleanup ops	31-05 (A)(3)	n	n	y	y	n	n	y	n	y	n	n	n	<p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements, and the hourly emission limitation is based on the EU's potential to emit, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.</p>

R039	none	21-07(G)(2)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-the permittee shall not employ any coating or cleanup material in this EU that is a photochemically reactive material.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements, and the hourly emission limitation is based on the EU's potential to emit, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.</p>
R039	none	17-11(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-the UMRE of PE emissions is less than 10 lbs/hr. Therefore, pursuant to 17-11(A)(2)(ii), this EU is exempt from the requirements of 17-11(B)(2).</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited.</p> <p>-must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements, and the hourly emission limitation is based on the EU's potential to emit, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.</p>

R039	none	17-07(A)	n	y	y	y	n	n	y	n	y	n	n	n	<p>ND-this EU is exempt from the VE particulate emission limitations specified in 17-07 (A) pursuant to 17-07(A)(3)(h) b/c 17-11 is not applicable.</p> <p>OR-use of photochemically reactive material in this EU for coating and cleanup materials is prohibited. -must operate dry filtration system whenever EU is in operation.</p> <p>R,M&Rp-recordkeeping and monitoring for coating material usage & cleanup material usage and identifications of materials employed in this EU. Rp requirements met thru annual reporting on total OC emissions, and when a photochemically reactive material was employed, and if dry filtration system was running while EU was in operation.</p> <p>ET-Compliance determined based upon the required recordkeeping requirements, and the hourly emission limitation is based on the EU's potential to emit, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.</p>
R040 R041	none	17-11(A) 17-07(A) 21-07(G)(2)	y	n	n	n	n	n	n	n	n	n	n	n	<p>ND-17-11(A) the UMRE of PE is less than 10 lbs/hr, there fore, 17-11(A)(2)(a)(ii), figure II, of 17-11(B)(2) does not apply, and table I does not apply b/c facility is located in Ashland County. 17-07(A) EU is exempt from visible PE emission limitaitons b/c 17-11 is not applicable. 21-07 (G)(2)- is not applicable b/c the facility is not located in a Priority county and the EU was installed prior to February 15, 1972.</p>
R042	8.0 lbs OC/hr, 40.0 lbs OC/day	n	y	n	n	n	n	n	n	n	n	n	n	n	<p>ND-17-11(A) the UMRE of PE is less than 10lbs/hr, there fore, 17-11(A)(2)(a)(ii), figure II, of 17-11(B)(2) does not apply, and table I does not apply b/c facility is located in Ashland County. 17-07(A) EU is exempt from visible PE emission limitaitons b/c 17-11 is not applicable</p> <p>Misc.-permittee installed EU in January of 1979 with out first obtaining a PTI in violation of 31-02.therefore permittee shall perform the following in order to bring EU into comliance; submit a PTI application within 2 months of the issuance of this permit, and obtain a PTI within 8 months following the issuance of this permit.</p>

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.