

Statement of Basis For Title V Permit

Company Name	Iten Industries, Inc.	
Premise Number	02-04-01-0112	
Number of Non-insignificant Emissions Units	18	
What makes this facility a Title V facility?	> 100 tpy for OC and VOC (37 tpy limit given for K004. Other 3 treaters not given a tpy limit, but are similiar to K004. All 4 treaters given a percent reduction requirement. For purpose of estimating PTE, the 4 treaters can emit $37 \times 4 = 148$ tpy of VOC. PTE for P003 is 7.3 tpy OC. PTE for P006 is 7.3 tpy OC. PTE for P013 - P016 is 0.70 tpy OC each. Total PTE is 165.4 tpy of OC & 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	
NA			

C 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.

C 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, K003, K004	81% VOC reduction	21-09(B)(6)	N	Y	Y	Y	Y	Y	N	OR - temp. restriction for thermal oxidizer from SIP 3745-21-09(B)(3)(j)
K003	2.9 lbs VOC per gallon of coating	N	Y	N	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05(A)(3) BAT equivalent to requirements of OAC rule 3745-21-09(F) and (G). OAC rule 3745-21-09(B)(6) allows for 81% VOC reduction in lieu of complying with lbs VOC per gallon solids limitation.
K004	90% destruction of VOC	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05(A)(3) BAT requirement includes requirement contained in OAC rule 3745-21-09(B)(6) stating that control equipment shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions.
K004	2.9 lbs VOC per gallon of coating, excl water & exempt solvents, or if control employed, 4.8 lbs VOC per gallon of solids	21-09(G)	N	Y	Y	Y	Y	Y	N	OAC rule 3745-21-09(B)(6) allows for 81% VOC reduction in lieu of complying with lbs VOC per gallon solids limitation contained in OAC rule 3745-21-09(G)
P003	85% OC reduction	21-07(G)(2)	N	Y	Y	Y	Y	Y	N	
P003	OC from ph.rx clean-up included with regulated emissions	21-07(G)(4)	N	Y	Y	Y	Y	Y	N	ph.rx = photochemically reactive
P003	90% destruction of OC by incineration	21-07(G)(6)(a)	N	Y	Y	Y	Y	Y	N	

P006	20% opacity	17-07(A)	N	N	Y	Y	Y	N	N	OR = PE emissions to be vented to fabric filter Method 9 test to determine compliance, only if required
P006	1.78 lbs PE/hr	17-11	N	N	Y	Y	Y	N	N	PE emissions assumed to be minimal, if any. Therefore, no ET required.
P006	8 lbs OC/hr, 40 lbs OC/day	21-07(G)(2)	N	N	Y	Y	Y	N	N	No ET required. Compliance based on record keeping.
P006	OC from ph.rx clean- up included with regulated emissions	21-07(G)(4)	N	N	Y	Y	Y	N	N	No ET required. Compliance based on record keeping.
P006	20% opacity	31-05(A)(3)	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) BAT requirement equivalent to OAC 3745-17-07(A) PE emissions assumed to be minimal, if any. Therefore, no ET required.
P006	1.78 lbs PE/hr	31-05(A)(3)	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) BAT requirement equivalent to OAC 3745-17-11 PE emissions assumed to be minimal, if any. Therefore, no ET required.
P006	8 lbs OC/hr, 40 lbs OC/day	31-05(A)(3)	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) BAT requirement equivalent to OAC 3745-21-07(G)(2) No ET required. Compliance based on record keeping.
P006	OC from ph.rx clean- up included with regulated emissions	31-05(A)(3)	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) BAT requirement equivalent to OAC 3745-21-07(G)(4) No ET required. Compliance based on record keeping.
P013, P014, P015, P016	3.81 lbs OC/day, 0.70 ton OC/year	31-05(A)(3)	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - max styrene content in mix not to exceed 14.3% by weight, and max daily raw material usage not to exceed 2,644 lbs resin per day No ET required. Compliance based on record keeping.
P013, P014, P015, P016	8 lbs OC/hr, 40 lbs OC/day	21-07(G)(2)	N	N	Y	Y	Y	N	N	OAC rule 3745-21-07(G)(2) is less stringent than OAC rule 3745-31- 05(A)(3) No ET required. Compliance based on record keeping.

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

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 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 comments. 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.

C 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.