

Statement of Basis For Title V Permit

Company Name	Jaite Packaging d.b.a Sealright, Inc.	
Premise Number	1677000105	
Number of Non-insignificant Emissions Units	13	
What makes this facility a Title V facility?	Volatile Organic Compounds	
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	
Paragraphs 1 and 2	N	Y	These paragraphs establish federally enforceable facility limitations on VOC, individual HAP, and total combined HAPs in order to avoid PSD permitting and the Printing and Publishing MACT, 40 CFR Part 63, subpart KK.
Paragraphs 3, 3a, 3b, and 3c	N	Y	These paragraphs establish the record keeping for determining the VOC, individual HAP, and total combined HAPs emissions from the facility to verify compliance with the facility emission limitations is paragraph 2.
Paragraphs 4 and 5	N	Y	These paragraphs establish the reporting requirements for the facility emission limitations in paragraph 2.
Paragraph 6	N	Y	This paragraph is for the initial notification report requirement for area sources in 40 CFR Part 63, subpart KK.
Paragraphs 7 and 7a	N	Y	These paragraph show the applicable compliance methods for the facility emission limitations.

- **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							
K003, K005, K006, and K010	65% capture efficiency and 90% control efficiency	21-09(Y)	N	Y	Y	Y	Y	Y	N	OR-For emissions units controlled with the catalytic incinerator, operating restriction on the average temperature of the exhaust gases immediately before the catalyst bed and the average temperature across the catalyst bed. For emissions units controlled with a thermal incinerator, operating restriction on the average combustion temperature within the thermal incinerator.
K008, K013, K014, K015, and K016	80% overall control efficiency	N	Y	Y	Y	Y	Y	Y	N	OR - For emissions units controlled with the catalytic incinerator, operating restriction on the average temperature of the exhaust gases immediately before the catalyst bed and the average temperature across the catalyst bed. For emissions units controlled with a thermal incinerator, operating restriction on the average combustion temperature within the thermal incinerator. Other - The emission limitation is based on OAC rule 3745-31-05.
K008	49.0 lbs/hr VOC and 25.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05.
K010	12.5 lbs/hr VOC and 39.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05.
K012	0.7 lbs/hr VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.

K012, K017, K018, and K019	40% VOC by volume of the coating or ink, excluding water and exempt solvents or 25% VOC by volume of volatile matter in the coating or ink	21-09(Y)	N	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
K013	30.0 lbs/hr VOC and 25.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.
K014	46.0 lbs/hr VOC and 25.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.
K015	15.0 lbs/hr VOC and 10.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.
K016	30.0 lbs/hr VOC and 12.8 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.
K017, K018, and K019	1.4 lbs/hr VOC and 1.0 TPY VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required Other - The emission limitation is based on OAC rule 3745-31-05.

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 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.

- 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.