

Statement of Basis For Title V Permit

Company Name	LDM Technologies, Inc.	
Premise Number	0165010084	
Number of Non-insignificant Emissions Units	6	
What makes this facility a Title V facility?	Potential Emissions of HAPs and VOC exceed those levels which trigger Title V thresholds.	
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	
n/a			

- **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							
P002, R004, R005, R006, R009 and R010	8 lbs of OC/hr and 40 lbs OC/day	21-07 (G)(2)		n	y	y	y	n	n	ET- Compliance based upon Method 24 analyses, record keeping requirements and AP-42 emission factors, as applicable.
R004	34.6 lbs OC/hr, 41.7 Tons OC/yr	n	y	y	y	y	y	n	n	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. These limits apply for the days in which only non PRM coatings are employed. OR- Coating usageand OC content restrictions to ensure compliance with the federally enforceable 12-month rolling emission limitation of 41.7 tons OC/yr. ET- Compliance based upon Method 24 analyses and record keeping requirements.
R004, R005, R006, R009 and R010	0.551 lb of PM/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - The emissions units shall only be operated when the dry filtration systems are in service. The operational restriction along with the associated monitoring and/or record keeping and reporting requirements will help ensure compliance with the OAC Chapter 3745-17 rules. ET- Compliance based upon worst case emission calculation.
R004, R005, R006, R009 and R010	20% opacity as a 6-minute average except as provided by rule	17- 07(A)		n	y	y	y	n	n	OR - The emissions units shall only be operated when the dry filtration systems are in service. The operational restriction along with the associated monitoring and/or record keeping and reporting requirements will help ensure compliance with the OAC Chapter 3745-17 rules. ET- If required, Method 9 shall be employed to demonstrate compliance with this emission limitation.
R005, R009	18.9 lbs OC/hr, 2.3 Tons OC/yr	n	y	y	y	y	y	n	n	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. These limits apply for the days in which only non PRM coatings are employed. OR- Coating usageand OC content restrictions to ensure compliance with the federally enforceable 12-month rolling emission limitation of 2.3 tons OC/yr. ET- Compliance based upon Method 24 analyses and record keeping requirements.

R006	25.2 lbs OC/hr, 14.5 Tons OC/yr	n	y	y	y	y	y	n	n	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. These limits apply for the days in which only non PRM coatings are employed. OR- Coating usage and OC content restrictions to ensure compliance with the federally enforceable 12-month rolling emission limitation of 14.5 tons OC/yr. ET- Compliance based upon Method 24 analyses and record keeping requirements.
R010	37.8 lbs OC/hr, 42.2 Tons OC/yr	n	y	y	y	y	y	n	n	Other - Emission limitations established pursuant to OAC rule 3745-31-05 as part of a synthetic minor permit to install. These limits apply for the days in which only non PRM coatings are employed. OR- Coating usage and OC content restrictions to ensure compliance with the federally enforceable 12-month rolling emission limitation of 42.2 tons OC/yr. ET- Compliance based upon Method 24 analyses and record keeping requirements.

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.