

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Bondo/Mar-Hyde Corporation	
Premise Number	1409010340	
Number of Non-insignificant Emissions Units	19	
What makes this facility a Title V facility?	VOC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
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.

- 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 (374 5- )	Other							
K001	33.2 lbs VOC/day	21- 09(U )2(f )	N	N	Y	Y	Y	Y	N	M. Coating usage and VOC content records required. R. Coating usage and VOC content records required. Rp. Deviation reports required. ET. USEPA Methods 24 and 24A shall be used to determine VOC content.
P001	Use of PRMs prohibited	21- 07(G )2	N	Y	Y	Y	Y	Y	N	OR. Use of PRMs prohibited. M. Monthly records of material PRM or not required. R. Monthly records of material PRM or not required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
P002	8 lbs OC/hr, 40 lbs OC/day	21- 07(G )2	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	50 lbs PM- PM10/day	31- 05(A )3	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	Fugitive visible emissions limited to 20% opacity as 3- minute average	17- 07(B )	N	N	N	N	N	Y	N	ET. Compliance determined by Method 22 of 40 CFR Part 60 Appendix A.
	Use of RACM	17- 08(B )	N	Y	N	N	N	N	N	OR. Use of tight fitting covers required.
P003	8 lbs OC/hr, 40 lbs OC/day	21- 07(G )2	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	50 lbs PM- PM10/day	31- 05(A )3	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.

	Fugitive visible emissions limited to 20% opacity as 3-minute average	17-07(B)	N	N	N	N	N	Y	N	ET. Compliance determined by Method 22 of 40 CFR Part 60 Appendix A.
	Use of RACM	17-08(B)	N	Y	N	N	N	N	N	OR. Use of tight fitting covers required.
P004	8 lbs OC/hr, 40 lbs OC/day	21-07(G)(2)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	50 lbs PM-PM10/day	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	Fugitive visible emissions limited to 20% opacity as 3-minute average	17-07(B)	N	N	N	N	N	Y	N	ET. Compliance determined by Method 22 of 40 CFR Part 60 Appendix A.
	Use of RACM	17-08(B)	N	Y	N	N	N	N	N	OR. Use of tight fitting covers required.
P005	8 lbs OC/hr	21-07(G)(2)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	30.9 lbs OC/day, 1.56 lbs PM-PM10/hr	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	Fugitive visible emissions limited to 20% opacity as 3-minute average	17-07(B)	N	N	N	N	N	Y	N	ET. Compliance determined by Method 22 of 40 CFR Part 60 Appendix A.

P006	8 lbs OC/hr	21-07(G)(2)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	29.6 lbs OC/day	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
P007	6.5 lbs OC/hr, 26 lbs OC/day	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P008	1.53 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.53 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P009	1.36 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.36 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P011	1.53 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.53 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P012	1.54 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.54 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	

P013	1.54 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.54 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P014	1.53 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.53 lbs/hr.
	Less stringent	21-07(G)(2)	N	N	N	N	N	N	N	
P015	40 lbs OC/day	21-07(G)(2)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	3 lbs OC/hr	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
P017	8 lbs VOC/hr, 40 lbs VOC/day	21-07(G)(2)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	50 lbs PM-PM10/day	31-05(A)(3)	N	N	Y	Y	Y	Y	N	M. Daily usage records required. R. Daily usage records required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.
	Fugitive visible emissions limited to 20% opacity as 3-minute average	17-07(B)	N	N	N	N	N	Y	N	ET. Compliance determined by Method 22 of 40 CFR Part 60 Appendix A.
	Use of RACM	17-08(B)	N	Y	N	N	N	N	N	OR. Use of tight fitting covers required.
P020	Use of PRMs prohibited	21-07(G)(2)	N	Y	Y	Y	Y	Y	N	OR. Use of PRMs prohibited. M. Monthly records of material PRM or not required. R. Monthly records of material PRM or not required. Rp. Deviation reports required. ET. Compliance determined by record-keeping.

	1.1 lbs OC/hr	31-05(A)(3)	N	N	N	N	N	Y	N	ET. Compliance determined by facility provided maximum potential emissions of 1.1 lbs/hr.
T009	Use of submerged fill	21-07(D)	N	Y	N	N	N	N	N	OR. Use of submerged fill required.
	Keep storage vessel dimensions records	N	40 CFR part 60 Subpart Kb	N	N	Y	N	N	N	R. Storage vessel dimensions records required.
T016	Use of submerged fill	21-07(D)	N	Y	N	N	N	N	N	OR. Use of submerged fill required.
	Keep storage vessel dimensions records	N	40 CFR part 60 Subpart Kb	N	N	Y	N	N	N	R. Storage vessel dimensions records required.

EU = emissions unit id

OR = operational restriction

M = 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 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, record keeping, 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.