

Statement of Basis For Title V Permit

Company Name	Monarch Marking Systems, Inc.	
Premise Number	0857090718	
Number of Non-insignificant Emissions Units	10	
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	

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K005	36.26 lbs OC/day, excluding cleanup	31-05 (A)(3) 21-07 (G)(2)	PTI 08-1922	N	Y	Y	Y	N	N	OR: It is not necessary to develop operational restrictions to ensure compliance, compliance is based upon record keeping. M: The permittee shall monitor the coatings employed in this emissions unit for both volume of coating employed and the OC content of the coatings employed. R: The permittee shall maintain monthly records of the coatings employed and the average daily OC emission rate. Rp: The permittee shall submit quarterly deviation reports that identify all exceedances of the daily OC emission rate. ET: Testing is not required to ensure compliance, compliance is based upon record keeping. M: There are no miscellaneous requirements.
K005	9.6 TPY OC, including cleanup	31-05 (A)(3)	PTI 08-1922	N	Y	Y	Y	N	N	OR: It is not necessary to develop operational restrictions to ensure compliance, compliance is based upon record keeping. M: The permittee shall monitor the coatings and cleanup materials employed in this emissions unit for both volume employed and the OC content of the coatings and cleanup materials employed. R: The permittee shall maintain monthly records of the coatings and cleanup materials employed and the OC emission rate. Rp: The permittee shall submit annual reports of the annual OC emission rate. ET: Testing is not required to ensure compliance, compliance is based upon record keeping. M: There are no miscellaneous requirements.
K050, K051, K052, and K053	4.77 lbs VOC/hour	31-05 (A)(3)	PTI 08-3372	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit, based upon the maximum hourly adhesive and silicone usages multiplied by the respective maximum VOC contents. Therefore, it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.
K050, K051, K052, and K053	14.9 TPY VOC, as a rolling, 365-day summation	31-05 (A)(3)	PTI 08-3372	Y	Y	Y	Y	N	N	OR: The permittee is restricted on the maximum annual adhesive and silicone usages, as a rolling, 365-day summation. M: The permittee shall monitor the amount of adhesive and silicone employed in this emissions unit as well as the VOC contents. R: The permittee shall maintain daily records of the volume of adhesives and silicones employed, the VOC contents, and the VOC emission rate. Rp: The permittee shall submit quarterly reports which identify any exceedances of the annual VOC emission limitation and/or usage limitations. ET: Emissions testing is not required, compliance is based upon record keeping. M: There are no miscellaneous requirements

K050, K051, K052, and K053	0.046 lb VOC/gallon excluding water and exempt solvents for adhesives 0.86 lb VOC/gallon excluding water and exempt solvents for silicones	31-05 (A)(3) 21-09 (F)	PTI 08-3372	Y	Y	Y	Y	Y	N	<p>OR: The permittee is restricted to maximum VOC contents for the adhesives and silicones employed in this emissions unit.</p> <p>M: The permittee shall monitor the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>R: The permittee shall maintain daily records of the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>Rp: The permittee shall submit deviation reports identifying any records which indicate the use of noncomplying adhesives and silicones.</p> <p>ET: The permittee shall use formulation data or USEPA Reference Method 24 to determine the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>M: There are no miscellaneous requirements.</p>
K050, K051, K052, and K053	0.010 kg VOC/kg solids for the adhesives 0.113 kg VOC/kg solids for the silicones	31-05 (A)(3)	PTI 08-3372 NSPS 40 CFR Part 60 Subpart RR	Y	Y	Y	Y	Y	N	<p>OR: The permittee is restricted to maximum VOC contents for the adhesives and silicones employed in this emissions unit.</p> <p>M: The permittee shall monitor the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>R: The permittee shall maintain daily records of the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>Rp: The permittee shall submit deviation reports identifying any records which indicate the use of noncomplying adhesives and silicones.</p> <p>ET: The permittee shall use formulation data or USEPA Reference Method 24 to determine the VOC content of the adhesives and silicones employed in this emissions unit.</p> <p>M: There are no miscellaneous requirements.</p>

K050, K051, K052, and K053	182,000 gallons adhesive usage (110,020 gallons excluding water) as a rolling, 365-day summation 62,400 gallons silicone usage (28,080 gallons excluding water) as a rolling, 365-day summation	31-05 (A)(3)	PTI 08-3372	Y	Y	Y	Y	N	N	OR: The permittee is restricted to maximum annual adhesive and silicone usage limitations as a rolling, 365-day summation. M: The permittee shall monitor the volume of adhesives and silicones employed in this emissions unit. R: The permittee shall maintain daily records of the volume of adhesives and silicones employed in this emissions unit. Rp: The permittee shall submit annual reports identifying any exceedances of the maximum annual adhesive and/or silicone usage limitations. ET: Emissions testing is not necessary, compliance is based upon record keeping. M: There are no miscellaneous requirements.
K055	0.04 lb VOC/gallon excluding water and exempt solvents 0.01 kg VOC/kg solids, as applied	31-05 (A)(3) 21-09 (F)	PTI 08-4106 NSPS 40 CFR Part 60 Subpart RR	Y	Y	Y	Y	Y	N	OR: The permittee is restricted to maximum VOC contents for the coatings employed in this emissions unit. M: The permittee shall monitor the VOC content of the coatings employed in this emissions unit. R: The permittee shall maintain monthly records of the VOC content of the coatings employed in this emissions unit. Rp: The permittee shall submit deviation reports identifying any records which indicate the use of noncomplying coatings. ET: The permittee shall use formulation data or USEPA Reference Method 24 to determine the VOC content of the coatings employed in this emissions unit. M: There are no miscellaneous requirements.
K055	1.50 lbs VOC/hour	31-05 (A)(3)	PTI 08-4106	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit, based upon the maximum hourly coating usage multiplied by the maximum VOC content. Therefore, it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.

K055	6.57 TPY VOC	31-05 (A)(3)	PTI 08- 4106	Y	Y	Y	Y	N	N	OR: The permittee is restricted to a maximum VOC content for all coatings employed. M: The permittee shall monitor the VOC content and volume of all coatings employed. R: The permittee shall maintain monthly records of the VOC emissions. Rp: The permittee shall submit reports identifying any exceedances of the VOC content limitations. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.
K056	0.50 lb VOC/gallon excluding water and exempt solvents 0.06 kg VOC/kg solids, as applied	31-05 (A)(3) 21-09 (F)	PTI 08- 4106 NSPS 40 CFR Part 60 Subpart RR	Y	Y	Y	Y	Y	N	OR: The permittee is restricted to maximum VOC contents for the coatings employed in this emissions unit. M: The permittee shall monitor the VOC content of the coatings employed in this emissions unit. R: The permittee shall maintain monthly records of the VOC content of the coatings employed in this emissions unit. Rp: The permittee shall submit deviation reports identifying any records which indicate the use of noncomplying coatings. ET: The permittee shall use formulation data or USEPA Reference Method 24 to determine the VOC content of the coatings employed in this emissions unit. M: There are no miscellaneous requirements.
K056	2.14 lbs VOC/hour	31-05 (A)(3)	PTI 08- 4106	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit, based upon the maximum hourly coating usage multiplied by the maximum VOC content. Therefore, it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.
K056	9.37 TPY VOC	31-05 (A)(3)	PTI 08- 4106	Y	Y	Y	Y	N	N	OR: The permittee is restricted to a maximum VOC content for all coatings employed. M: The permittee shall monitor the VOC content and volume of all coatings employed. R: The permittee shall maintain monthly records of the VOC emissions. Rp: The permittee shall submit reports identifying any exceedances of the VOC content limitations. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.
L001	3.8 TPY VOC	31-05 (A)(3)	PTI 08- 851	Y	Y	Y	Y	N	N	OR: The permittee is required to operate the cold cleaner with the operating and control measures specified in OAC rule 3745-21-09(O)(2). M: The permittee shall monitor the solvent used in this cold cleaner. R: The permittee shall maintain monthly records of the solvent usage and VOC emission rate. Rp: The permittee shall submit annual reports summarizing the monthly VOC emission rate. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.

P016	8 lbs OC/hour	21-07 (G)(2)		N	Y	Y	Y	N	N	OR: No operational restrictions are necessary to ensure compliance. Compliance is based upon record keeping. M: The permittee shall monitor the solvents employed in this emissions unit. R: The permittee shall maintain daily records of the OC content and volume of solvent employed and the calculated average hourly OC emission rate. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the hourly organic compound emission rate. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.
P016	40 lbs OC/day	21.-07 (G)(2)		N	Y	Y	Y	N	N	OR: No operational restrictions are necessary to ensure compliance. Compliance is based upon record keeping. M: The permittee shall monitor the solvents employed in this emissions unit. R: The permittee shall maintain daily records of the OC content and volume of solvent employed as well as of the daily OC emission rate. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the daily organic compound emission rate. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.
P017	8 lbs OC/hour, excluding cleanup	31-05 (A)(3) 21-07 (G)(2)	PTI 08- 1089	N	Y	Y	Y	N	N	OR: No operational restrictions are necessary to ensure compliance. Compliance is based upon record keeping. M: The permittee shall monitor the solvents employed in this emissions unit. R: The permittee shall maintain daily records of the OC content and volume of solvent employed and the calculated average hourly OC emission rate. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the hourly organic compound emission rate. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.
P017	37.2 lbs OC/day, excluding cleanup	31-05 (A)(3) 21-07 (G)(2)	PTI 08- 1089	N	Y	Y	Y	N	N	OR: No operational restrictions are necessary to ensure compliance. Compliance is based upon record keeping. M: The permittee shall monitor the solvents employed in this emissions unit. R: The permittee shall maintain daily records of the OC content and volume of solvent employed as well as of the daily OC emission rate. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the daily organic compound emission rate. ET: No emissions testing is required, compliance is based upon record keeping. M: There are no miscellaneous requirements.

P017	4.7 TPY OC, including cleanup	31-05 (A)(3)	PTI 08-1089	N	Y	Y	Y	N	N	<p>OR: No operational restrictions are necessary to ensure compliance. Compliance is based upon record keeping.</p> <p>M: The permittee shall monitor the liquid materials and cleanup materials in this emissions unit.</p> <p>R: The permittee shall maintain daily records of the OC emissions from the liquid materials employed and monthly records of the OC emissions from the cleanup materials employed.</p> <p>Rp: The permittee shall submit annual reports of the OC emissions.</p> <p>ET: No emissions testing is required, compliance is based upon record keeping.</p> <p>M: There are no miscellaneous requirements.</p>
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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

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