

Statement of Basis For Title V Permit

Company Name	Mullins Rubber Products Inc.		
Premise Number	08-57-77-0747		
Number of Non-insignificant Emissions Units	4		
What makes this facility a Title V facility?	HAPs		
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			

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		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001	36.0 lbs VOC/day	31- 05(A)(3)	PTI 08- 2975	Y	N	Y	Y	N	N	<p>OR - The permittee is limited to a daily maximum coating usage not to exceed 5 gallons</p> <p>M - monitoring requirements are not required due to record keeping.</p> <p>R - The permittee shall maintain daily record of the total VOC emissions rate for all coatings employed.</p> <p>Rp - The permittee shall submit quarterly deviation (excursion) reports identifying each day during which VOC emission daily limit was exceeded.</p> <p>ET - Compliance shall be demonstrated through record keeping requirements. Emission testing is not required.</p>
K001	5 gallon maximum daily coating usage	21- 09(U)(2) (e)(i)		Y	Y	Y	Y	N	N	<p>OR - The permittee is limited to a daily maximum coating usage not to exceed 5 gallons</p> <p>M - monitoring requirements are not required due to record keeping.</p> <p>R - The permittee shall maintain of the total volume, in gallons of all of the coatings employed.</p> <p>Rp - The permittee shall submit within 45 days after the exceedance occurs any daily record showing that the emissions unit employs more than the applicable daily coating usage limit.</p> <p>ET - Compliance shall be demonstrated through record keeping requirements. Emission testing is not required.</p>
K001	2.86 tons VOC/yr	31- 05(D)	08- 2975	N	N	Y	N	N	N	<p>OR - No operational restrictions are necessary</p> <p>M - monitoring requirements are not required due to record keeping.</p> <p>R - The permittee shall maintain monthly record of the total VOC emissions rate for all coatings and cleanup materials employed.</p> <p>ET - Compliance shall be demonstrated through record keeping requirements. Emission testing is not required.</p>
K001	0.551/20% opacity	17- 11/17- 07		Y	Y	Y	Y	N	N	

L001 and L002	control combination Table 2, option 6 (freeboard refrigeration device, reduced room draft and freeboard ratio 1.0)		40 CFR Part 63, Subpart T	Y	Y	Y	Y	N	N	OR - The permittee shall meet all of the required work and operational practices. ET - Compliance shall be demonstrated through monitoring, record keeping and reporting requirements. Emission testing is not required.
L001 and L002	21.0 tons VOC/yr combined	31-05(A)(3)		N	Y	Y	Y	N	N	OR - No operational restrictions are necessary M - monitoring requirements are not required due to record keeping. ET - Compliance shall be demonstrated through record keeping and reporting requirements. Emission testing is not required.
R001	8 gallon maximum daily coating usage	21-09(U)(2)(e)(i)								OR - The permittee is limited to a daily maximum coating usage not to exceed 8 gallons M - monitoring requirements are not required due to record keeping. R - The permittee shall maintain of the total volume, in gallons of all of the coatings employed. Rp - The permittee shall submit within 45 days after the exceedance occurs any daily record showing that the emissions unit employs more than the applicable daily coating usage limit. ET - Compliance shall be demonstrated through record keeping requirements. Emission testing is not required.

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.