

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Nylonge
Premise Number	02-47-04-0822

Number of Non-insignificant Emissions Units	8
What makes this facility a Title V facility?	CS ₂ (HAP)
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			

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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.

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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							
P001, P002, P003, P004, P005, P007, and P008		21-07 (G)(2)	N	N	N	Y	Y	N	N	The emissions units are exempt from this rule and will employ non-PRCM only. R and Rp are sufficient to ensure the emissions unit employing non-PCRM.
P001, P002, and P008	0.2 lb/hr of VOC for each emissions unit	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P001, P002, P003, P004, P005, P007, and P008	80% VOC reduction	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.

P001, P002,, P003, P004, P005, P007, and P008	99.4 tons/yr of VOC for EUs P001 - P005, P007 and P008	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) 8000 hrs/rolling 365-day/emissions unit for P001, P002, P005, P007, and P008, with R, Rp requirement. CAM rule is not currently applicable. (e) 12,000 hrs/rolling 365-day for emissions units P003 and P004, with R, Rp requirement. (f) CAM rule is not currently applicable.
P003, P004, P005, and P007	90% reduction of H ₂ S	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P003, and P004	0.76 lb/hr H ₂ S for each emissions unit	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P003, and P004	6.8 lb/hr of VOC for each emissions unit	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P005	1.92 lb/hr VOC.	N		Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.

P005	0.21 lb/hr of H ₂ S	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P007	10.35 lb/hr of VOC	N	Y	Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.
P007	0.06 lb/hr of H ₂ S	N		Y	Y	Y	Y	Y	N	Basis - OAC rule 3745-31-05, and synthetic minor PTI No. 02-9121. OR - (a) pressure drop across the biofilter, with M, R, and Rp requirement. (b) average temperture at the inlet of biofilter, with M, R, and Rp requirement (c) pH of the back-up packed bed scrubber liquor, with M, R, and Rp requirement. (d) CAM rule is not currently applicable.

- Note:
1. In accordance with US EPA consent agreement and consent order # CAA-5-99-003, the back-up scrubber is required to operate on 80% of the day during the “high ozone” period from May 1 to September 1 for the years 1999, 2000, and 2001. This condition has R and Rp requirement.
 2. In accordance with OAC rule 3745-31-05 and synthetic minor PTI No. 9121, compliance with applicable VOC removal efficiency shall be determined based on the arithmetic average of the preceding 15 days’ average control efficiency.
 3. In accordance with OAC rule 3745-31-05 and synthetic minor PTI No. 9121, the average daily VOC removal efficiency shall be determined by using a gas chromatography. This daily average shall be determined based on a minimum of three sets of samples.
 4. In accordance with OAC rule 3745-31-05 and synthetic minor PTI No. 9121, the permittee shall develop and follow an approved preventive maintenance plan for the biofiltration control system and the backup packed tower scrubber.

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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Instructions for Part III:

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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.

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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.

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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.