

Statement of Basis For Title V Permit

Company Name	Omega Pultrusions Inc.	
Premise Number	16-67-02-0035	
What makes this facility a Title V facility?	HAP (styrene)	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	PTI 16-02195 issued January 31, 2002 for the installation of a new adhesive churn (P320)	

Part II (State and Federally Enforceable Requirements)		
Term and Condition (paragraph)	Basis	Comments

	SIP (3745-)	Other	
1-4	N	Y	To avoid additional new source review requirements, federally enforceable facility-wide emission limitations were established for VOC, organic materials, and styrene in the PTI. Applicable daily record keeping and exceedance reporting were included to ensure compliance.
5	N	Y	Listing of insignificant emissions unit P619 and it's associated PTI.
6 - 42	N	Y	The requirements of 40 CFR Part 63, Subpart WWWW

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		N D	O R	M	S t	E N F	R	St	Rp	S t	E T	Misc	Comments
		SIP (3745-)	Other												
L001 - L003	20.0 lbs/day VOC		Y	N	N	N	N	N	Y	N	Y	N	Y	N	The emission limitation was established pursuant to a federally enforceable PTI, #16-980. M - Monitoring restrictions are not required due to record keeping.
L001 - L003		21-09(O)	N	N	Y	N	N	N	N	N	N	N	N	N	OR - To minimize solvent evaporation, the permittee shall comply with the operational restrictions and work practices established by OAC rule 3745-21-09(O). CAM is not applicable. M - Monitoring requirements are not required. R - Record keeping requirements are not required. Rp - Reporting is not required. ET - Emissions testing is not required.
T001 - T003	1.46 TPY styrene		Y	N	N	N	N	N	Y	N	Y	N	N	N	The emission limitation was established pursuant to a federally enforceable PTI, #16-980. M - Monitoring restrictions are not required due to record keeping. ET - Emissions testing is not required.
T001 - T003	Submerge fill pipe		Y	N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	The control requirement was established pursuant to a federally enforceable PTI, #16-980.
T001 - T003		21-09(L)		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	These storage tanks are exempt from the requirements of OAC rule 3745-21-09(L)(1) in accordance with the size exemptions as specified in OAC rule 3745-21-09(L)(2)(a).
P320	5.4 lbs/hr OC, 10.8 lbs/day, 1.97 tpy		Y	N	N	N	N	N	Y	N	Y	N	N	N	The emission limitation was established pursuant to PTI 16-02195 M - Monitoring requirements are not required due to record keeping. ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.

P901 - P915, P922 - P928	8.0 lbs/hr organic materials, 40.0 lbs/day organic materials		Y	N	N	N	N	N	Y	N	Y	N	N	N	The emission limitation was established pursuant to a federally enforceable PTI, #16-980. M - Monitoring requirements are not required due to record keeping. ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.
P901 - P915, P922 - P928	0.2 lbs/hr particulate matter		Y	N	Y	Y	N	N	Y	N	Y	N	N	N	The emission limitation was established pursuant to a federally enforceable PTI, #16-980. OR - Permittee shall maintain the pressure drop across the baghouse within the range of 2 to 5 inches of water. CAM does not apply.
P901 - P915, P922 - P928-	20% opacity as a 6-minute average (stack), 20% opacity as a 3-minute average (fugitive)	17-07		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Permittee shall maintain the pressure drop across the baghouse within the range of 2 to 5 inches of water. CAM does not apply.
P901 - P915, P922 - P928	RACM	17-08		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	
P901 - P915, P922 - P928		17-11		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	The emissions required by this rule is less stringent than the emission limitation as determined using best available technology.
P901 - P915, P922 - P928 P320		21-07(G)		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	The emissions required by this rule is less stringent than the emission limitation as determined using best available technology.
P917 - P919	20.0 lbs/day organic materials		Y	N	N	N	N	N	Y	N	Y	N	N	N	The emission limitation was established pursuant to a federally enforceable PTI, #16-980. M - Monitoring requirements are not required due to record keeping. ET - Permittee shall demonstrate compliance through the record keeping requirements. Emission testing is not required.

P917 - P919	20% opacity as a 6-minute average (stack), 20% opacity as a 3-minute average (fugitive)	17-07		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Permittee shall maintain the pressure drop across the baghouse within the range of 2 to 5 inches of water. CAM does not apply.
P917 - P919	RACM	17-08		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	
P917 - P919		17-11		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	The emissions required by this rule is less stringent than the emission limitation as determined using best available technology.
P917 - P919		21-07(G)		N	n/a	n/a	N	N	n/a	N	n/a	N	n/a	N	The emissions required by this rule is less stringent than the emission limitation as determined using best available technology.

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

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, 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.

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.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.