

Statement of Basis For Title V Permit

Company Name	Plasti-Kote Co. Inc.	
Premise Number	1652050060	
Number of Non-insignificant Emissions Units	31	
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	
Paragraphs 1 and 2	N	Y	These paragraphs establish federally enforceable facility limitations on VOC, individual HAP, and total combined HAPs in order to avoid being classified as major for PSD and to avoid being classified as a major source for hazardous air pollutants for the upcoming Miscellaneous Organic Chemical Production and Processes MACT standard, 40 CFR Part 63, subpart FFFF and Plastic Parts (surface coating) MACT standard, 40 CFR Part 63, Subpart PPP.
Paragraphs 3, 3a, 3b, 3c, 3d, 3e, 3f, 3g, 3h, 3i, 3j, and 3k	N	Y	These paragraphs establish the record keeping for determining the VOC, individual HAP, and total combined HAPs emissions from the facility to verify compliance with the facility emission limitations in paragraph 2.
Paragraphs 4 and 5	N	Y	These paragraphs establish the reporting requirements for the facility emission limitations in paragraph 2.
Paragraphs 6 and 6a	N	Y	These paragraphs show the applicable compliance methods for the facility emission limitations.
Paragraph 7	N	Y	This paragraph is an operation restriction that the aerosol paint cans can not be gas with a material that contains any HAPs and that the permittee should maintain documentation to prove the gas contains no HAPs.

• **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 (3745-)	Other							
K001, K002, K003, P002, P003, P004, P005, P006, P021, P022, P023, P024, P025, P026, R003, R004, R005, and R006	8.0 lbs/hr and 40 lbs/day of Organic Material when employing , applying, evapo- rating, or drying a photo- chemically reactive material	21-07(G)(2)	N	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
K002 and R004	117.0 lbs/day VOC	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).
K002 and R004	252.0 lbs/day of acetone for coatings	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).
K002 and R004	50.0 tpy of acetone for coatings and cleanup material	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).

K002, R003, R004, R005, and R006	0.551 lb/hr of particulates	17-11	N	N	N	N	N	N	N	M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the “worst-case” coating.
K002, R003, R004, and R006	2.41 tpy of particulates	N	Y	N	N	N	N	N	N	M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the “worst-case” coating. Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).
K002, R003, R004, R005, and R006	20% opacity, as six-minute average	17-07(A)	N	Y	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. As long as the filters are maintained, the permittee will meet this requirement. Emission testing is not required. OR - The permittee is required to operate a double frame filter when the emissions unit is in operation.
K002	The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling 12-month summation of the coating usage figures	N	Y	Y	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. OR - The limitation is the operational restriction. Other - The emission limitation is based on OAC rule 3745-31-05(D).

K002	6.1 tons of VOC per rolling, 12-month period	N	Y	Y	Y	Y	Y	N	N	<p>ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.</p> <p>OR - The coating usage is limited in order to restrict the annual VOC emission rate. The permittee is also restricted to only employing cleanup material that does not contain VOC.</p> <p>Other - The emission limitation is based on OAC rule 3745-31-05(D).</p>
K002 and R004	The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively	N	Y	N	Y	Y	Y	N	N	<p>ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.</p> <p>Other - The emission limitation is based on OAC rule 3745-31-05(D).</p>
P007	0.5 lb/hr and 2.2 tpy of particulate emissions	N	Y	N	N	N	N	N	N	<p>Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).</p> <p>M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.</p>
P007	3.53 lbs/hr of OC	N	Y	N	N	N	N	N	N	<p>Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).</p> <p>M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.</p>
P007	17.5 tpy of OC, including cleanup material emissions	N	Y	N	Y	Y	Y	N	N	<p>Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).</p> <p>ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.</p>

P007	40 lbs/day of Organic Material when employing , applying, evaporating, or drying a photochemically reactive material	21-07(G)(2)	N	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P007	20% opacity as a six-minute average	17-07(A)	N	N	N	N	N	N	N	M, R, Rp, and ET - There should be little or no visible emissions from the addition of the pigments.
P009, P010, P011, P012, P013, P014, P015, P016, and P017	8.0 lbs/hr and 40.0 lbs/day of OC	21-09(G)(2)	N	N	N	N	N	N	N	M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the “worst-case” scenario.
P009, P010, P011, P012, P013, P014, P015, P016, and P017	7.3 tpy of OC	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the “worst-case” scenario.
P018 and P019	2.3 lbs/hr of VOC	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the “worst-case” scenario.
P018 and P019	192.6 lbs/day OC	N	Y	N	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.

P018, P019, and P020	27.6 tpy of OC for P018, P019, and P020 combined	N	Y	N	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P018 and P019	0.27 lb of individual HAP/ton of paint produced	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.
P018 and P019	0.60 lb of combined HAPs/ton of paint produced	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.
P018, P019, and P020	3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation	N	Y	Y	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). OR - The paint production rate is limited in order to restrict the emissions of HAPs. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P018, P019, and P020	7.54 tons of combined HAPs per year for P018, P019, P020, combined, as a rolling 12-month summation	N	Y	Y	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). OR - The paint production rate is limited in order to restrict the emissions of HAPs. ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P018, P019, and P020	40 lbs/day of VOC	21-09(G)(2)	N	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.

P020	2.56 lbs/hr of VOC	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.
P020	191.3 lbs/day of OC	N	Y	N	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P020	0.30 lb of individual HAP per ton of paint produced	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.
P020	0.67 lb of combined HAPs per ton of paint produced	N	Y	N	N	N	N	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(D). M, R, Rp, and ET - Permittee shall demonstrate compliance through a calculation based on the "worst-case" scenario.
R003 and R006	256.0 lbs/day of VOC	N	Y	N	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
R003 and R006	98.4 lbs/day and 18.0 tpy of acetone for coatings	N	Y	N	Y	Y	Y	N	N	Other - The emission limitation is based on OAC rule 3745-31-05(A)(3). ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.

R003 and R006	The maximum annual fleckstone coating usage, clear coat coating usage, and the cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, base upon a rolling, 12-month summation of the coating and cleanup material usage figures	N	Y	Y	Y	Y	Y	N	N	<p>ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.</p> <p>OR - The limitation is the operational restriction.</p> <p>Other - The emission limitation is based on OAC rule 3745-31-05(D).</p>
R003 and R006	17.31 tons of VOC per rolling 12-month period for coatings and cleanup material	N	Y	Y	Y	Y	Y	N	N	<p>ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.</p> <p>OR - The coating usage is limited in order to restrict the annual VOC emission rate.</p> <p>Other - The emission limitation is based on OAC rule 3745-31-05(D).</p>

R003 and R006	The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively	N	Y	N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. Other - The emission limitation is based on OAC rule 3745-31-05(D).
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R004	The maximum annual car color usage and red spot primer coating usage for this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures	N	Y	Y	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. OR - The limitation is the operational restriction. Other - The emission limitation is based on OAC rule 3745-31-05(D).
R004	5.74 tons of VOC per rolling, 12-month period for coatings	N	Y	Y	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. OR - The coating usage is limited in order to restrict the annual VOC emission rate. The permittee is also restricted to only employing cleanup material that does not contain VOC. Other - The emission limitation is based on OAC rule 3745-31-05(D).
R005	26.0 lbs/day of total organic compounds, excluding cleanup emissions	N	Y	Y	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required. OR - The coating usage is limited to 5.0 gallons per day. Other - The emission limitation is based on OAC rule 3745-31-05(A)(3).

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

- **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 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.

- 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.