

Statement of Basis For Title V Permit

Company Name	Plas-Tanks Industries, Inc	
Premise Number	1409040850	
What makes this facility a Title V facility?	Individual HAP (styrene)emissions greater than 10 TPY	
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.		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

▼ **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.

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

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P001- P006	8.0 lbs OC/Hr	21- 07(G)		N	N	Y	N	N	Y	N	Y	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR - The hourly OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit.</p> <p>M&R - The amount and styrene content of resins and gelcoats employed, the emission factor, and hours of operation are tracked on a daily basis. This allows for the hourly OC emissions to be directly calculated.</p> <p>Rp - Deviation reports for hourly and daily OC limits are present.</p> <p>ET - No emission testing is required, the emissions are calculated on a daily basis.</p>
	40.0 lbs OC/Day	21- 07(G)		N	N	Y	N	N	Y	N	Y	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit.</p> <p>M&R - The amount and styrene content of resins and gelcoats employed, the emission factor are tracked on a daily basis. This allows for the daily OC emissions to be directly calculated.</p> <p>Rp - Deviation reports for hourly and daily OC limits are present.</p> <p>ET - No emission testing is required, the emissions are calculated on a daily basis.</p>

	7.3 TPY		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	<p>This emission unit is not subject to CAM OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the annual limit. M&R - The amount and styrene content of resins and gelcoats employed, the emission factor are tracked on a daily basis. This allows for the annual OC emissions to be directly calculated by taking a summation of the daily emission totals. Rp - Deviation reports for daily OC limits are present. An annual report for the OC emission from the resins and gelcoats employed is required. ET - No emission testing is required, the emissions are calculated on a daily basis.</p>
	Total OC emissions from P001-P006 shall not exceed 250 lbs/day from cleanup materials employed		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	<p>This emission unit is not subject to CAM OR - The OC emission rates are calculated on a daily basis. No OR is required to limit the emission unit to ensure compliance with the hourly limit. M&R - The amount and OC content of cleanup materials employed in P001-P006 are tracked on a daily basis. This allows for the OC emissions to be directly calculated on a daily basis. Rp - Deviation reports for daily OC limits are present. ET - No emission testing is required, the emissions are calculated on a daily basis.</p>

	Total OC emissions from P001-P006 shall not exceed 45.63 TPY from cleanup materials employed		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR - The OC emission rates are calculated on a daily, monthly, and rolling 12-month summation basis. No OR is required to limit the emission unit to ensure compliance with the annual limit.</p> <p>M&R - The amount and OC content of cleanup materials employed in P001-P006 are tracked on a daily basis. This allows for the OC emissions to be directly calculated on a daily basis. The daily emission calculations are used to generate monthly and rolling, 12-month summations for the OC emissions from cleanup materials</p> <p>Rp - Deviation reports for daily OC limits are present. Annual reports for the total OC emissions from P001-P006 are required.</p> <p>ET - No emission testing is required, the emissions are calculated on a daily, monthly, and rolling 12-month summation basis.</p>
	20% opacity as a six minute average	17-07(A)		N	N	N	N	N	N	N	N	N	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR- No OR is required, the latest CFA guidance indicates the transfer efficiency in the resin/gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected.</p> <p>M&R- See OR for explanation as to why no monitoring is required</p> <p>Rp- See OR for explanation as to why no reporting is required.</p> <p>ET- See OR for explanation as to why no testing is required</p>
	20% opacity as a three minute average	17-07(B)		N	N	N	N	N	N	N	N	N	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR- No OR is required, the latest CFA guidance indicates the transfer efficiency in the resin/gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected.</p> <p>M&R- See OR for explanation as to why no monitoring is required</p> <p>Rp- See OR for explanation as to why no reporting is required.</p> <p>ET- See OR for explanation as to why no testing is required</p>

	2.94 lbs PE/Hr and 12.88 TPY of PE, the TPY limit is based on the hourly emission limit at 8760 hours per year		31-05	N	N	N	N	N	N	N	N	N	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR- No OR is required, the latest CFA guidance indicates the transfer efficiency in the resin/gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected. The potential PE emissions based on the latest CFA emission information indicates the potential to emit is well less than the allowable for this emission unit</p> <p>M&R- See OR for explanation as to why no monitoring is required</p> <p>Rp- See OR for explanation as to why no reporting is required.</p> <p>ET- The emission calculation based on the worse case gelcoat employed and the latest CFA emission factors demonstrating the PTE of PE is less than the allowable is present.</p>
	1.55 lbs PE/Hr and 6.78 TPY of PE, the TPY limit is based on the hourly emission limit at 8760 hours per year	17-11		N	N	N	N	N	N	N	N	N	N	N	N	<p>This emission unit is not subject to CAM</p> <p>OR- No OR is required, the latest CFA guidance indicates the transfer efficiency in the resin/gelcoat process is 99%+. Therefore very little PE is emitted. During facility inspections no stack or fugitive visible emission have ever been detected. The potential PE emissions based on the latest CFA emission information indicates the potential to emit is well less than the allowable for this emission unit</p> <p>M&R- See OR for explanation as to why no monitoring is required</p> <p>Rp- See OR for explanation as to why no reporting is required.</p> <p>ET- The emission calculation based on the worse case gelcoat employed and the latest CFA emission factors demonstrating the PTE of PE is less than the allowable is present.</p>

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping 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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- 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. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.