

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	S & S/Superior of Ohio, Inc.	
Premise Number	0302020314	
Number of Non-insignificant Emissions Units	29	
What makes this facility a Title V facility?	VOC and HAP emissions	
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	
B.1	Y		List each insignificant emissions unit located at the facility and states that each unit must still comply with all applicable state and federal regulations as well as any issued PTI.

- **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, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	coating usage not to exceed ten gallons per day	21-09 (U)(2) (e)(ii)		N	N	Y	Y	N	N	M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	0.551 lb PE/hr	17-11 (B)(1)		Y	N	Y	Y	Y	N	OR - permittee required to operate dry filtration system. M - No monitoring requirements are necessary to show compliance.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	20% opacity as a six-minute average	17-07 (A)		N	N	N	N	Y	N	M - No monitoring requirements are necessary to show compliance. R - No recordkeeping is required to show compliance. Rp - No reporting is required to show compliance. Use of dry filtration system to comply with opacity limit.
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	59.2 lbs OC/day from coating operations	N	Y	N	N	Y	Y	N	N	Other - daily OC limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	10.8 tons OC/yr from coating operations	N	Y	N	N	Y	Y	N	N	Other - annual OC limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	group limit of 25 tons OC/yr from coating operations	N	Y	N	N	Y	Y	N	N	Other - group limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P001, P002, P003, P004	102 lbs OC/day from autobody finishing operations	N	Y	N	N	Y	Y	N	N	Other - daily OC limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P001, P002, P003, P004	group limit of 9.11 tons OC/yr from autobody finishing operations	N	Y	N	N	Y	Y	N	N	Other - group limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012	8 lbs OC/hr, 40 lbs OC/day	21-07 (G)(2)		N	N	Y	Y	N	N	M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012	7.3 tons OC/yr from gluing operations	N	Y	N	N	Y	Y	N	N	Other - annual OC limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012	group limit of 16.5 tons OC/yr from gluing operations	N	Y	N	N	Y	Y	N	N	Other - group limit established by OAC rule 3745-31-05 M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, P001, P002, P003, P004, R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012	2 tons OC/mth from cleanup operations	N	Y	Y	N	Y	Y	N	N	Other - monthly OC limit established by OAC rule 3745-31-05 OR - the permittee shall not employ any cleanup material that is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5). M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, P001, P002, P003, P004, R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012	group limit of 17.03 tons OC/yr from cleanup operations	N	Y	Y	N	Y	Y	N	N	Other - The group limit for cleanup operations was established in PTI to avoid cost effectiveness study. OR - the permittee shall not employ any cleanup material that is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5). M - No monitoring requirements are necessary to show compliance. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

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 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.

- 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.