

Statement of Basis For Title V Permit

Company Name	Steelox Systems Incorporated	
Premise Number	01 24 01 0003	
Number of Non-insignificant Emissions Units	7	
What makes this facility a Title V facility?	Potential emissions of organic compounds exceed those levels which trigger Title V thresholds.	
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	
Na			

- **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							
										Steelox manufactures steel buildings. Emissions units include rolling mills shot blaster and coating lines.
K003 & K004	3.5 Lbs/gal VOC per gallon of coating excluding water and exempt solvents	21-09 (u) (1) (d)		N	N	Y	Y	Y	N	Misc. The permit includes record keeping requirements to insure compliance with the applicable ET= Method 24 and/or 24A to determine VOC content.
P008, P009, P010 and P012	The amount of Vanishing Oil applied in any one day shall be less than 10 gallons	21-09 (u) (2) (e) (ii)	N	Y	N	Y	Y	Y	N	OR= Less than 10 gallons of Vanishing oil per day. Misc. The permit includes record keeping requirements to insure compliance with the applicable RP= The facility shall notify in writing of any monthly record showing the use of noncompliant coatings.
P003	PM shall not exceed 28.19 Lbs/hr.	17-07 (A)(1) and 17-11 (B)(3)	Y	N	N	Y	Y	Y	N	Misc. - The permit requires the permittee to monitor and record pressure drop across the baghouse. ET= If required, Methods 1-5 to determine PM emissions.

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.