

Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	The Ohio Art Company	
Premise Number	03-86-01-0161	
Number of Non-insignificant Emissions Units	7	
What makes this facility a Title V facility?	VOC	
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	
n/a			

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Ot he r							
K001 K002 K003 K011	81% overall and 90% reduction efficiency for the thermal incinerator	21-09(B)(6) in lieu of 21-09(U)(1)		Y	Y	Y	Y	Y	N	OR- The permittee shall operate the thermal incinerator whenever this emissions unit is in operation. The average combustion temperature, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
K008	3.0 lbs VOC/gallon of coating, excluding water and exempt solvents, or 81% overall and 90% reduction efficiency for the thermal incinerator			Y	Y	Y	Y	Y	N	OR- The permittee shall operate the thermal incinerator whenever this emissions unit is in operation. The average combustion temperature, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
K012	None	21-07		N	N	N	N	N	N	This emissions unit is located in Williams County [not a "Priority I" county as defined in paragraph (A) of OAC rule 3745-21-06] and is not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

K010	3.0 lbs VOC/gallon of coating, excluding water and exempt solvents	21-09(U)(1)(a)(i)		Y	Y	Y	Y	N	N	OR- Each coating employed in this emissions unit shall comply with the VOC content specified in condition A.I.1 of the terms and conditions of this permit on an "as applied" basis. ET- No testing is required. Compliance can be demonstrated based on the record keeping requirements.
P001	20% opacity	17-07		Y	Y	Y	Y	N	N	OR- The permittee is require to employ a baghouse and maintain a pressure drop across the baghouse of 2-8 inches of water. ET- No testing is required.

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.