

Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	Tiffin Metal Products Co.	
Premise Number	03-74-02-0165	
Number of Non-insignificant Emissions Units	3	
What makes this facility a Title V facility?	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	
A.1. to A.5.	21-09 (A)(3)(b)		Emission units K001 and K002 are not subject to VOC limits under OAC rule 3745-21-09 due to VOC emissions less than 100 tons/year for the facility. To ensure that VOC emissions are less than 100 tons/year for the facility, the following are specified for emission units K001, K002, and K003 and for natural gas combustion at the facility: a restriction on rolling 12-month VOC emissions, a restriction on cumulative total VOC emissions, monthly records on VOC emissions, and deviation reports.

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	0.551 lb/hr particulate emissions (PE)	17-11 (B)(2)		Y	N	Y	Y	N	N	OR - Operation of water curtain (K001/ K002) or dry filtration system (K003) M - Not required to demonstrate compliance. R - Daily record on non-operation of water curtain or dry filtration system. Rp - Deviation report on non-operation of water curtain or dry filtration system. ET - Not required to demonstrate compliance (emission calculation specified).
	20% opacity	17-07 (A)		N	N	N	N	N	N	M - No VE monitoring due to operation of water curtain or dry filtration system. Rp - * ET - Not required to demonstrate compliance * - See recording and reporting for PE limit
	See Part II (100 tons/year for VOC)	21-09 (A)(3)(b)		N	N	Y	Y	N	N	M - No monitoring needed due to record keeping and reporting. R - Monthly records on coating usage and VOC emissions. Rp - Deviation report on VOC emissions (see Part II A.5.). ET - Not required to demonstrate compliance.
K003	10 gal/day exemption	21-09 (U)(2)(e)		N	N	Y	Y	N	Y	M -No monitoring needed due to record keeping and reporting. R - Daily record on number of gallons of coatings employed. Rp - Deviation report if daily number of gallons of coatings employed exceeds 10. ET - Not required to demonstrate compliance.

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.