

# Statement of Basis For Title V Permit

Company Name	TS Trim Industries		
Premise Number	0125031840		
Number of Non-insignificant Emissions Units	5		
What makes this facility a Title V facility?	OC, HAP		
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			

- **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							
R019, R020, R021, R024, and R025	The OC emission from R019, R020, R021, R024 and R025 shall not exceed 38.4 lbs/hr, excluding cleanup emissions.	N	31-05  (PTI 01-6663)	Y	N	N	N	N	N	OR - requires OC emissions be vented to the control system (carbon bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit..
R019, R020, R021, R024, and R025	The OC emission shall be vented to the control system which shall maintain an overall reduction of 90% by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the OC emissions from this emissions unit.	21-07 (G)(6)	31-05  (PTI 01-6663)	Y	Y	Y	Y	Y	N	<p>OR - requires permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.</p> <p>M - requires continuous parametric monitoring of: a) differential pressure of permanent enclosure; b) carbon bed concentrator outlet for organic compound emissions; and c) combustion temperature of e thermal incinerator box.</p> <p>R - requires daily record keeping for a) the differential pressure in inches of water, for each rolling, 15-minute period;; b) the shaft revolutions of the solvent laden air fan, in revolutions per minute; c. the NMOC concentrations of the exhaust gases from the carbon bed concentrator, in ppm;d) all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and e.) a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.</p> <p>Rp - submit quarterly deviation (excursion) reports that identify the following: a) all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger; b) all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm; c) all periods of time, when the emissions unit was in operation, during which the solvent laden air fan speed was not maintained at 725 revolutions per minute; d) all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and e) any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.</p> <p>ET - shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.</p>

R019, R020, R021, R024, and R025	The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.	N	31-05  (PTI 01-6663)	Y	Y	Y	Y	N	N	<p>OR - PTE maintained under negative pressure at a minimum differential pressure of not less than 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger.</p> <p>M - maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.</p> <p>R - collect and record the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period.</p> <p>Rp - submit quarterly deviation (excursion) reports that identify all period of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger.</p>
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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.