

# Statement of Basis For Title V Permit

12/15/06

<b>Part I - General</b>	
Company Name	Cleveland Manufacturing Division, Robin Industries
Premise Number	13-18-00-5887
What makes this facility a Title V facility?	Major source of HAP emissions, MACT Subpart T & MACT Subpart MMMM
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	<p>L001 - No major changes in the renewal terms. Added citations and clarified language to be consistent with current practices. Subject to 40 CFR Part 63 Subpart T.</p> <p>K001 (PTI #13-04237) The terms and conditions have changed for this emissions unit since the original Title V permit was issued. To allow for more manufacturing flexibility, the emissions unit was broken out into 8 emissions units, each being limited to using no more than 3 gal/day of coating. It is subject to 40 CFR Part 63 Subpart MMMM.</p> <p>K002 - K008 (PTI #13-04237) These are new emissions unit added since the original Title V permit was issued. It is subject to 40 CFR Part 63 Subpart MMMM.</p> <p>K009 - K014 (PTI# 13-04576) These are new emissions units added since the original Title V permit was issued. They are subject to 40 CFR Part 63 Subpart MMMM.</p>

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1	N	Y	40 CFR Part 63, Subpart M
A.2	N	Y	40 CFR Part 63, Subpart T
A.3	77	N	SIP; Insignificant emissions units are listed.

**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.

<b>Part III (Requirements Within the State and Federally Enforceable Section)</b>															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		N D	OR	M	St	EN F	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745- )	Other												

L001	Compliance as required by MACT Subpart T	N	40 CFR Part 63, Subpart T	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.</p> <p>OR - Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.</p> <p>OR - Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine.</p> <p>OR - Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.</p> <p>OR - During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.</p> <p>OR - During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.</p> <p>OR - When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.</p> <p>OR - The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment.</p>
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K001-K014	<p>Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 ton per year.</p> <p>Compliance as required by Subpart MMMM</p> <p>4.5 kg organic HAP/Liter of coating solids during each rolling 12-month period</p>	<p>31-05 (A) (3)</p> <p>21-09(U)(2)(e)(ii)</p>	<p>40 CFR Part 63, Subpart MMMM</p>	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>OR - Permittee shall employ no more than 3 gallons of coatings in any one day.</p> <p>OR - Permittee shall calculate the rolling 12-month HAP emission rate at the end of each month or meet work practice standards in 40 CFR 63.3893.</p> <p>OR - CAM rule is not applicable - the MACT standard requirements are more stringent and no control device is utilized.</p> <p>M - Record keeping of material usage and the requirements by Subpart MMMM.</p> <p>ET - Monitoring and record keeping of material usage and the applicable requirements of Subpart MMMM is sufficient to determine compliance.</p>
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EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping 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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- 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. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as

warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.