

# Statement of Basis For Title V Permit

Company Name	Berenfield Containers
Premise Number	02-78-00-0201
Number of Non-insignificant Emissions Units	6
What makes this facility a Title V facility?	VOC, HAPs
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	

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**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.

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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-K005	4.3 lbs VOC/gal	21-09(U)		N	Y	Y	Y	N	N	VOC limit for interior coatings of steel pail or drum
K001-K003, K006	3.5 lbs VOC/gal	21-09(U)		N	Y	Y	Y	N	N	VOC limit for exterior coating of steel pail or drum

K003-K006	20% opacity as a six minute ave.	17-07		Y	N	N	N	N	N	OR-Requires the use of either dry exhaust filtration system to control paint overspray. No monitoring, recordkeeping or overspray control system. AP-40 (page 865) indicates 95% removal efficiency for dry filtration system and 95% removal efficiency for CAM is not applicable. M -No monitoring, unless required by Ohio EPA. R-No recordkeeping required. Rp-No reporting required.
K003	1.72 lbs PM/hr	17-11		Y	N	N	N	N	N	OR-Requires the use of either dry exhaust filtration system to control paint overspray. No monitoring, recordkeeping or overspray control system. AP-40 (page 865) indicates 95% removal efficiency for dry filtration system and 95% removal efficiency for CAM is not applicable. M -No monitoring required. R-No recordkeeping required. Rp-No reporting required. Must calculate worse case hourly PM emission rate by the following equation: E= max. coating solids usage rate (lbs/hr) x (1-TE) x (1-CE) Emission rate; TE = transfer efficiency; CE = control efficiency.
K004,K005	0.63 lb PM/hr	17-11		Y	N	N	N	N	N	OR-Requires the use of either dry exhaust filtration system to control paint overspray. No monitoring, recordkeeping or overspray control system. AP-40 (page 865) indicates 95% removal efficiency for dry filtration system and 95% removal efficiency for CAM is not applicable. M -No monitoring required. R-No recordkeeping required. Rp-No reporting required. Must calculate worse case hourly PM emission rate by the following equation: E= max. coating solids usage rate (lbs/hr) x (1-TE) x (1-CE) Emission rate; TE = transfer efficiency; CE = control efficiency.
K006	2.1 lbs PM/hr	17-11		Y	N	N	N	N	N	OR-Requires the use of either dry exhaust filtration system to control paint overspray. No monitoring, recordkeeping or overspray control system. AP-40 (page 865) indicates 95% removal efficiency for dry filtration system and 95% removal efficiency for CAM is not applicable. M -No monitoring required. R-No recordkeeping required. Rp-No reporting required. Must calculate worse case hourly PM emission rate by the following equation: E= max. coating solids usage rate (lbs/hr) x (1-TE) x (1-CE) Emission rate; TE = transfer efficiency; CE = control efficiency.

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

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**Instructions for Part III:**

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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.

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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.

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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.