

Statement of Basis For Title V Permit

Part I - General	
Company Name	Joint Systems Manufacturing Center
Premise Number	0302020027
What makes this facility a Title V facility?	SO ₂ emissions
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)

B003, B005 and B006 - changed pressure drop range for baghouse which controls these 3 coal fired boilers from 1-4", to 2-20" water column.

B008 - changed emissions unit ID to P025, and changed to insignificant emissions unit, incorrectly identified as non-insignificant when initial Title V permit issued

B009 - changed emissions unit ID to P026, and changed to insignificant emissions unit, incorrectly identified as non-insignificant when initial Title V permit issued

B010, Z015 and Z031 - emissions units permanently shut down, deleted from permit

K001 - PTI #03-13953, added new emissions limits and terms for OC and PE limits, changed particulate control from "wet curtain system" to "dry filtration system"

K002 - changed particulate control from "wet curtain system" to "dry filtration system"

K004 - PTI #03-13953, new coating line, added all terms from this PTI

K006 - PTI #03-17347, new coating line, added all terms from this PTI

P002 - baghouse pressure drop was incorrect in initial Title V permit, changed to 1 to 5 inches water column

P003, P010, P022, P901, P902, P904, Z001, Z013, Z014, Z016, Z017, Z018, Z019 and Z020 - deleted from insignificant emissions units list, since each is a trivial source, per Engineering Guide #16

P008, PTI #03-17360, added terms from PTI (voluntary grain loading restriction for baghouse)

P017 - PTI #03-14056, added terms from PTI (voluntary grain loading restriction for baghouse)

P024 - renumbered the emissions unit (was previously Z010, but is now non-insignificant)

P028 and P029 - PTI #03-17360, new shot blasters, added all terms from this PTI

R001, R002 - changed from insignificant to non-insignificant status, since there are requirements for PE and OC emissions, added applicable terms

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None			

C

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.

Part III (Requirements Within the State and Federally Enforceable Section)															
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		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B003, B005, B006	20% opacity, as a 6-min. ave.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - opacity monitor is used to determine compliance, facility submits quarterly excess emission reports for opacity monitor
B007	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
K001, K004	0% opacity, as a 6-min. ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings CAM is not applicable

K002, K003, K006, R001, R002	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings CAM is applicable for K006; CAM is not applicable for K002, K003, R001 and R002
P002, P008	0% opacity, as a 6-min. ave.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings
P028, P029	0% opacity, as a 6-min. ave.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - opacity limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings; CAM is applicable
P011	20% opacity, as a 6-min. ave.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings
P014, P017, P019, P020, P023	20% opacity, as a 6-min. ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	ET - permittee operates a baghouse with maintenance requirements as part of CAM plan; M, R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings; CAM is applicable
B003	0.225 lb PE/mmBtu of actual heat input	17-10 (C)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - stack testing required during last 6 months of permit term, based on Engineering Guide #16

B003	4.5 lbs SO ₂ /mmBtu of actual heat input	18-08(l)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - sulfur content is restricted on each coal shipment to ensure compliance with SO ₂ emission limit ET - coal shipment fuel analysis for heat content and sulfur content, and corresponding SO ₂ emissions calculations are sufficient to demonstrate compliance without requiring stack testing
B005, B006	1.6 lbs SO ₂ /mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - SO ₂ limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - sulfur content is restricted on each coal shipment to ensure compliance with SO ₂ emission limit ET - coal shipment fuel analysis for heat content and sulfur content, and corresponding SO ₂ emissions calculations are sufficient to demonstrate compliance without requiring stack testing
B005, B006	0.62 lb NO _x /mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - NO _x limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B005, B006	0.03 lb PE/mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - PE limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B005, B006	0.08 lb CO/mmBtu of actual heat input	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - CO limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - stack testing required twice during permit term, based on Engineering Guide #16
B007	0.020 PE lb/mmBtu of actual heat input	17-10 (C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable

B007	0.1 lb NOx/mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - NOx limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B007	4.45 lb CO /mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - CO limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B007	0.04 lb SO2/mmBtu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - SO2 limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - natural gas is the only fuel allowed to be fired ET - testing not required, inherently clean fuel - M, R and Rp (deviation reporting) only required if fuel other than natural gas is fired CAM is not applicable
B003, B005, B006, B007	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Other - 40 CFR Part 63, Subpart DDDDD ND - This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD). If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA. M, R, Rp and ET - there are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

K001, K004	35 lbs OC/hr and 100.8 tons OC/yr for K001 and K004 combined	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (coating usage and emissions calculations)
K001, K004	3,440 lbs OC/month and 20.64 tons OC/yr from cleanup operations for K001 and K004 combined	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (cleanup materials usage and emissions calculations)
K001, K004	3.00 lbs PE and 8.64 tons PE/yr for K001 and K004 combined	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance
K001, K004, K006	3.5 lbs VOC/gal minus water and exempt solvents for extreme performance coating (daily volume weighted average)	21-09 (U)(1)(c)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (maintain supplier formulation data sheets)

K002, K003, R001, R002	3.5 lbs VOC/gal excluding water and exempt solvents	21-09 (U)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (maintain supplier formulation data sheets)
K002, K003, K006, R001, R002	0.551 lb PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - dry filtration system required for coating overspray ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance
K006	172.02 lbs OC/hr and 58.18 tons OC/yr for wash solvent, coating and cleanup operations	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (Note: the hourly OC limit does not require M, R and Rp since the emissions are set at the potential to emit; wash solvent, coating and cleanup materials usage and emissions calculations are compiled)
K006	40.52 tons VOC/rolling 12-month period for wash solvent, coating and cleanup operations	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (wash solvent, coating and cleanup materials usage and emissions calculations are compiled)
K006	0.40 ton PM10/rolling 12-month period	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - permittee operates dry filtration system and maintains regular filter change schedule; M, R and Rp requirements are sufficient to demonstrate compliance

P002	0.01 grain PM10/dry standard cubic foot and 5.08 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P008	0.001 grain PM10/dry standard cubic foot and 2.26 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P011	3.38 lbs PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P014	3.02 lbs PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P017	0.03 grain PE/dry standard cubic foot; 0.39 lb PE/hr and 1.71 tons PE/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P019	2.31 lbs PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable

P020	0.83 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P023	0.77 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - pressure drop range of 1.5 to 5 inches water column, with pressure drop monitoring required ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable
P024	1.62 lbs CO/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P024	0.22 lb OC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P024	1.62 lbs NOx/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable

P024	0.54 lb SO2/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(A)(3) and all requirements have been transferred from the PTI OR - fuel usage is limited to 8 gal/hr ET - M, R and Rp requirements are sufficient to demonstrate compliance (track fuel usage and calculate emissions based on emission factor) CAM is not applicable
P028, P029	0.001 grain PM10/dry standard cubic foot and 1.13 tons PM10/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OC limit is established by OAC rule 3745-31-05(C) and all requirements have been transferred from the PTI ET - M, R and Rp requirements are sufficient to demonstrate compliance (permittee operates baghouse and conducts regular maintenance) CAM is applicable

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

C Instructions for Part III:

- C 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.
- C 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.

C **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.