

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Delphi Corporation - Sandusky Operations
Premise Number	0322020045
What makes this facility a Title V facility?	PE, SO2
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)	B001 & B002 - PTI #03-17045, issued 05-25-2006, to establish synthetic minor limits for HCl to avoid MACT. Limit restricts coal used on a rolling 12-month basis.
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)	B001 & B002 - PTI #03-17045, issued 05-25-2006, to establish synthetic minor limits for HCl to avoid MACT. Limit restricts coal used on a rolling 12-month basis. R002 - maintenance spray booth - no PTI - subject to OAC 3745-21-09(U)(2)(e)

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	77-07	31-03(A)(4)(b)	States insignificant EUs at the facility that have PTI or PBR requirements.

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												
B001, B002	9.50 tons HCl per rolling, 12-month period, from B001 & B002, combined	31-05(C)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The maximum rolling, 12-month coal throughput for B001 & B002 combined is limited by an equation which considers the chlorine content in weight % for each individual coal lot, and assumes that 100% of the chlorine contained in the coal is converted to HCl. Also, when fuel additive is employed to control HCl emissions, the application rate, in lbs of fuel additive per ton of coal processed, shall be maintained at a level of not less than the rate established during the most recent performance test. CEM is not justified. CAM is not applicable. ET - recordkeeping requirements are sufficient to show compliance, however, emission testing is required prior to employing a control efficiency for the use of fuel additive for the purposes of calculating HCl emissions.

B001, B002	0.235 pound PE/mmBtu of actual heat input	17- 10(C)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - pressure drop across the sidestream separator (baghouse) shall be maintained within the range of 2 to 10 inches of water while the emissions unit is in operation. CEM is not justified. CAM is not applicable. ET - If required, the permittee shall demonstrate compliance with this emission limitation based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.
B001, B002	Visible emissions shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M, R, & Rp - A Continuous Opacity Monitor (COM) is required to be utilized for these emissions units to ensure compliance with the 20% opacity requirement. ET - If required, compliance with the visible emissions limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
B001, B002	1.6 lbs SO2 /mmBtu of actual heat input	18-28(E)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The quality of the coal burned shall meet a sulfur content that is sufficient to comply with the allowable emission limitation. CEM is not justified. CAM is not applicable. ET - recordkeeping requirements are sufficient to show compliance, however, if required, the permittee shall demonstrate compliance with this emissions limitation in accordance with the methods specified in OAC rule 3745-18-04(D).
R002	Coating usage rate shall not exceed 10 gallons/day	21- 09(U)(2)(e )	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The coating usage rate in this emissions unit shall not exceed 10 gallons/day. ET - recordkeeping requirements are sufficient to show compliance.
R002	Use of particulate control and work practice require-ments	17-11(C)	N	N	Y	Y	N	N	Y	N	N	N	N	N	<b>OR - Use of particulate control device.</b> M,R, & R - Monitoring and record keeping requirements are work practice standards obtained directly from the applicable rule. No reporting is required, however, the company is required to maintain documentation on site for not less than 5 years, and to make the documentation available to Ohio EPA upon request. ET - not required since there is no emissions limitation established pursuant to this rule.

R002	none	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND- This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
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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

### 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.