

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Canton Drop Forge
Premise Number	15 76 00 0073
What makes this facility a Title V facility?	The potential to emit for sulfur dioxide exceeds the 100 tpy Title V applicability threshold.
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.	
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. All changes are listed and processed under the most stringent procedure (significant modification)
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)	<p>B001 - coal fired boiler; B002 and B003 - oil/natural gas fired boilers; P001 through P007, P009, P010, P016, P017, P019 through P021, P039, P041, and P046: forge-shop furnaces:</p> <p style="padding-left: 40px;">-Added facility-wide Synthetic Minor limitations for HAP emissions of 9.0 tpy for any individual HAP and 24.0 tpy for all HAPs combined, to avoid subpart DDDDD MACT requirements.</p> <p style="padding-left: 40px;">-Revised SO2 rule citations based on Federal approval of state SIP, OAC 3745-18-82</p> <p>P029 and P030 (shot blasters): These two Emissions Units have been permanently shutdown and deleted from the TV permit.</p> <p>P032 and P036 (shot blasters): These Emissions Units shared a group limit for particulate emissions with P029 and P030, which were shut down. A new particulate emissions limit (reduced) has been incorporated.</p> <p>Z002 (die washing unit) : Added this non-insignificant Emissions Unit which had previously been overlooked and not included in the TV permit. Since the unit was installed prior to 1974, no PTI was required.</p> <p>B001 - coal fired boiler: CAM does not apply since the permit modifications made are not related to the CAM-subject emissions (i.e., the modification doesn't involve the CAM-affected PSEU).</p>

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. All changes are listed and processed under the most stringent procedure (significant modification)
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)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
A.1	25-03	N	emission control action program requirements
A.2	N	Y	NAAQS modeling for SO2
A.3	Y	N	insignificant emissions units
A.4	77-07	N	Synthetic Minor limitations on HAP emissions from all fuel burning emissions units at the facility, 9.0 tpy for any individual HAP and 24.0 tpy for all HAPs combined, on a rolling 12-month sum, to avoid MACT requirements (40 CFR Part 63, Subpart DDDDD, boiler MACT).
A.5-A.6	77-07	N	Fuel sampling records and monthly record keeping requirements for facility-wide 12-month rolling sum of HAPs
A.7	77-07	N	Quarterly deviation reporting for facility-wide 12-month rolling sum of HAP emissions. Annual reports of actual facility-wide HAP emissions.
A.8	77-07	N	Compliance with facility-wide HAP emission limits based on record keeping requirements and field testing of the wet scrubber control efficiency if required.

**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												
	<b>BOILERS:</b>														
B001	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - scrubber operating parameter restrictions Misc. - none needed.
	0.150 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - scrubber operating parameter restrictions; ash content limitation Misc. - none needed.
	5.0 lbs SO <sub>2</sub> /MMBtu actual heat input 86 MMBtu/hr, 3-hr. average 62.5 MMBtu/hr, 24 hr. avg.	18-82(B)(1)	N	N	Y	Y	N	N	Y	Y	Y	Y	Y	N	OR - scrubber operating parameter restrictions; sulfur content limitation; limits on maximum heat input rate CAM not applicable R - daily records of average heat input Rp - quarterly deviation reports of exceedance of 3-hr and 24-hr. heat input limits; Misc. - none needed.
	Minimum stack height of 147.5 ft.	18-82(B)(2)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET: stack height verification by field inspection
B002	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	0.15 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	2.5 lbs SO <sub>2</sub> /MMBtu actual heat input	18-82(B)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil; limits on fuel sulfur content Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B003	20% opacity 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	0.15 lb PM/MMBtu actual heat input	17-10(C)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil Misc. - none needed.
	2.5 lbs SO2/MMBtu actual heat input	18-82(B)(3)	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - burn only natural gas and #6 fuel oil; limits on fuel sulfur content Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>ROTARY FURNACES:</b>														
P001 P002	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
P003 P004 P005 P006	20% opacity, 3-min. average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.
P007 P009 and P010	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
P041	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	Or, M, R, Rp, ET, Misc. - none needed.	
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. ET, Misc. - none needed.	
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.	
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.	
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.
	0.02 lb PM/MMBtu actual heat input	N	Y	N	Y	Y	N	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	0.15 lb SO2/MMBtu actual heat input	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	0.438 tpy PM	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
															OR - use of natural gas as primary fuel and #6 fuel oil as the backup.	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P041	0.05 tpy SO2	N	Y	N	Y	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 BAT limitation. OR - use of natural gas as primary fuel and #6 fuel oil as the backup. M, R, Rp, ET, Misc. - none needed.
	<b>BOX FURNACES:</b>														
P016 P017 P019 P020 P021 and P046	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	Or, M, R, Rp, ET, Misc. - none needed.
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. ET, Misc. - none needed.
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)4	N	N	Y	Y	N	N	Y	Y	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745- )	Other													
P039	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.	
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.	
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.	
	775 gal/hr, 18,600 gal/day, 6,789,000 gal/yr fuel oil for forge furnaces group limit. 0.05% sulfur in fuel oil.	18-82(B)(4)	N	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup; limits on total fuel oil consumption and fuel oil sulfur content; R - keep records of total hourly, daily and annual fuel oil burned in forge shop furnaces (group limit); Rp - Quarterly deviation reports on fuel oil burning rates and 0.05% sulfur in fuel oil limits. Misc. - none needed.
	BAT was determined to be in compliance with all applicable air pollution control rules.	N	Y													Other - OAC rule 3745-31-05

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>HEAT TREAT FURNACES:</b>														
P023 P024 P026 P027 and P040	No applicable limit	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - exclusive use of natural gas. Misc. - none needed.
	RACM - none; see comment	17-08(B)	N	N	Y	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed. No controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials (steel billets) employed in this emissions unit do not generate particulate emissions during the charging of the furnace or during the heating process.
	No applicable limit.	17-11	N	Y	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	20.7-37.4 lbs of SO2/hr (See specified emissions unit limitations)	18-06(E)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as primary fuel and #6 fuel oil as the backup. Misc. - none needed.
	<b>SHOT BLASTERS:</b>														
P032 and P036	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
	19.5 lbs PM/hr, combined limit from the exhaust stacks	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
P045	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation Misc. - none needed.
	BAT is more restrictive	17-11	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	1.0 lb PM/hr or no visible emissions from the exhaust stack	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - OAC rule 3745-31-05 emission limitation. OR - baghouse pressure drop limitation.
	4.38 tpy PM	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05 emission limitation.  OR, M, R, Rp, ET, Misc. - none needed.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	<b>GRINDING:</b>														
P033 P034 and P035	20% opacity, 6-minute average (stack)	17-07(A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation. Misc. - none needed
	20% opacity, 3-minute average (fugitive)	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	OR & Misc. - none needed.
	RACM - use of three-sided booth	17-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	OR, M, R, Rp, ET, Misc. - none needed.
	7.33 lbs PM/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse pressure drop limitation. Misc. - none needed.
	<b>MISCELLANEOUS:</b>														
Z002	8 lbs/hr and 40 lbs/day OC	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

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.