

Statement of Basis For Title V Permit

Company Name	American Steel Foundries, Inc.	
Premise Number	15-76-01-0014	
Number of Non-insignificant Emissions Units	41	
What makes this facility a Title V facility?	> 100 tpy PM10, > 100 tpy NOx, & > 100 tpy VOC.	
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	
n/a			

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments <u>1/</u>
		SIP (3745-)	Other							
F001, F004, F005, F006, F007, P001	N/A									1. Not located in an Appendix A area; OAC3745-17-08 not applicable.
F002	122.7 lbs/hr SO2	18-06(E)(1)		N	N	N	N	N	N	1. Not located in an Appendix A area; OAC3745-17-08 not applicable. 2. No M, Rk or Rp required, because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
F003	None	21-07		N	N	N	Y	N	N	1. Not located in an Appendix A area; OAC3745-17-08 not applicable. 2. No PRM used at this source. Deviation reporting if PRM ever used.
K001	3.5 lbs VOC per gallon coating	21-09(U)(1)		N	Y	Y	Y	N	N	ET- Compliance demonstrated through M, R and Rp requirements. Emissions testing not required.
K001	0.551 lb/hr PE	17-11(A)		Y	Y	Y	N	N	N	OR- must employ dry filtration system
K001	20 % opacity as six-minute average	17-07(A)		N	N	N	N	Y	N	ET- If required, Method 9 shall be employed to demonstrate compliance with the emissions limit.
P001	17.4 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P001	20 % opacity as six-minute average	17-07(A)(1)		N	N	N	N	N	N	ET- If required, Method 9 shall be employed to demonstrate compliance with the emissions limit.
P002, P013, P008, P014, P015	4.76 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	Y	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P003	9.1 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	N	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P004	3.0 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	N	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P005, P025	5.11 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	Y	N	OR-scrubber water supply pressure shall be NLT 20 psig and flow rate NLT 25 gpm
P006	5.01 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	N	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P009, P010, P012	6.56 lbs/hr PE	17-11(B)(1)		Y	Y	Y	Y	Y	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.

P011, P016- P018, P020, P023, P029- P033	4.78 lbs/hr PE	17- 11(B)(1)		Y	Y	Y	Y	Y	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P019	2.21 lbs/hr PE	17- 11(B)(1)		Y	Y	Y	Y	N	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P024	None	21-07		N	Y	Y	Y	Y	N	1. Not located in an Appendix A area; OAC3745-17-08 not applicable. 2. No PRM used at this source. Deviation reporting if PRM ever used.
P024	20 % opacity as six-minute average	17-07		N	Y	Y	Y	N	N	ET- Compliance demonstrated through M, R and Rp requirements. Emissions testing not required.
P026, P028	14.2 lbs/hr PE, 7.0 lbs/hr PE	17- 11(B)(1)		N	Y	Y	Y	Y	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P034	8.23 lbs/hr PE	17- 11(B)(1)		N	Y	Y	Y	N	N	OR- Pressure drop across baghouse to be maintained between 4.0 and 6.0 inches of water.
P901, P902	None	21-07		N	Y	Y	Y	N	N	1. Not located in an Appendix A area; OAC3745-17-08 not applicable. 2. No PRM used at this source. Deviation reporting if PRM ever used.

Note: (1) CAM rule is not currently applicable to any of the above emissions units.

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

- **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.

- 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.

- **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 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 each column where “N” is specified, there should be a brief explanation in the “Comments” section. 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.
- 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.

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