

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Buckeye Steel Castings Company		
Premise Number	01 25 04 0020		
Number of Non-insignificant Emissions Units	39		
What makes this facility a Title V facility?	Particulate emissions exceed the Title V threshold.		
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			

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.

C 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-)	Othe r							
K002	2.5 lbs VOC/hr and 11 tons VOC/yr	31- 05(A)(3) (PTI 01- 2930)		y	n	y	y	n	n	OR: Coating usage restricted to 6,000 gallons per year R: Monthly record keeping of coating and cleanup usage Rp: Annual VOC emission reporting.
K004	54 lbs VOC/hr and 69 tons VOC/yr	31- 05(A)(3) (PTI # 01-8142)		y	n	y	y	n	n	OR: Coating usage restricted to 50,000 gallons per year R: Monthly record keeping of coating and cleanup usage Rp: Annual VOC emission reporting.
P041	6.9 lbs PE/hr and 13.8 tons PE/yr	31- 05(A)(3) (PTI # 01-2694)		y	y	y	y	y	n	O: Monthly operating hours limited to 333 hours M: Daily baghouse monitoring. R: Daily baghouse pressure drop and monthly operating hour records. Rp: Quarterly reporting of operating hour exceedences. ET: Method 5 testing within 6 months after effective date of permit
P042	2.24 lbs NOX/hr and 9.8 tons NOX/yr	31- 05(A)(3) (PTI # 01-3173)		n	n	n	n	n	n	M: No monitoring requirements are necessary to show compliance. R: No record keeping requirements are necessary to show compliance. Rp: No reporting requirements are necessary to show compliance. T: No testing requirements are necessary to show compliance. Compliance demonstrated through calculations.
P043	2.2 lbs NOX/hr and 9.8 tons NOX/yr	31- 05(A)(3) (PTI # 01-7384)		n	n	n	n	n	n	M: No monitoring requirements are necessary to show compliance. R: No record keeping requirements are necessary to show compliance. Rp: No reporting requirements are necessary to show compliance. T: No testing requirements are necessary to show compliance. Compliance demonstrated through calculations.
P044	2.2 lbs NOX/hr and 9.8 tons NOX/yr	31- 05(A)(3) (PTI # 01-7384)		n	n	n	n	n	n	M: No monitoring requirements are necessary to show compliance. R: No record keeping requirements are necessary to show compliance. Rp: No reporting requirements are necessary to show compliance. T: No testing requirements are necessary to show compliance. Compliance demonstrated through calculations.
P046- P052	1.8 lbs OC/hr and 5.1 tons OC/yr	31- 05(A)(3) (PTI # 01-8129)		n	n	y	y	n	n	M: No monitoring requirements are necessary to show compliance. R: Monthly record keeping of sand usage. Rp: Quarterly exceedence reporting of annual emission limitation. T: No testing requirements are necessary to show compliance. Compliance demonstrated through calculations.

P053	4.1 lbs OC/hr and 17.9 tons OC/yr.	31- 05(A)(3) (PTI # 01-8082)		y	y	y	y	y	n	O: Scrubber solution PH shall not exceed 4.5 during production M: Daily monitoring of pressure drop across scrubber and pH of solution. R: Scrubber pressure drop and pH recorded once per shift. Rp: Quarterly exceedance reporting. ET: Emission test following startup at maximum production.
P055	2.67 lbs OC/hr and 8.28 tons/yr.	31- 05(A)(3) (PTI # 01-8119)		y	n	y	y	n	n	O: VOC content shall not exceed 5.3%, by weight; 1,033 gallons per month. R: Monthly record keeping of usage and VOC content of core wash. Rp: Quarterly exceedance reporting.
P903	2.5 lbs PE/hr and 9.7 tons PE/yr	31- 05(A)(3) (PTI # 01-6338)		n	y	y	n	n	n	M: Daily monitoring of bag house operation according to PM&MAP. R: Daily record keeping of bag house pressure drop. Rp: No reporting requirements are necessary to show compliance. ET: Emission test following startup at maximum production.
P904	0.02 grains/dscf from baghouse	(96CVH 98-6602)		n	y	y	y	y	n	M: Daily monitoring of bag house operation according to PM&MAP. R: Daily record keeping of bag house pressure drop. Rp: Quarterly exceedance reporting. ET: Emission testing using Method 5.
P905	5.34 lbs PE/hr and 23.38 tons PE/yr.	31- 05(A)(3) (PTI #01- 08119)		n	y	y	y	y	n	M: Daily monitoring of bag house operation according to PM&MAP. R: Daily record keeping of bag house pressure drop. Rp: Quarterly exceedance reporting. ET: Emission testing using Method 5.
P907	3.4 lbs PE/hr and 14.9 tons PE/yr	31- 05(A)(3) (PTI # 01-3005)		n	y	y	n	n	n	M: Daily monitoring of bag house operation according to PM&MAP. R: Daily record keeping of bag house pressure drop. Rp: No reporting requirements are necessary to show compliance. ET: Emission test following startup at maximum production.

F006, K004, P007, P009, P011, P012, P029, P030, P032, P033, P041, P046- P053, P901- P907	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average.	17-07(A)(1)		n	y	y	y	y	n	M: Daily monitoring for visible emissions from stack. R: Daily record keeping of presence of visible emissions. Rp: Quarterly excursion reporting to show compliance. ET: If required, visible emission observation using Method 9.
F006, P007- P009, P012, P029, P030, P032, P033, P901, P902, and P904	Particulate emissions shall not exceed those levels listed in Table 1	17-11 (A)(1)		n	n	n	n	y	n	ET: If required, Method 5 testing within 6 months after effective date of permit
P011, & F010	Particulate emissions shall not exceed those listed in Figure 1	17-11 (A)(1)		n	n	n	n	y	n	ET: If required, Method 5 testing.

F006-F010, P007, P009, P011, P012, P029, P030, P032, P033, P041, P046-P053, P901-P907	Appendix A - RACM to control fugitive dust.	17-08(B)		n	y	y	y	y	n	M: Daily monitoring for visible particulate emissions of fugitive dust. R: Daily record keeping of abnormal visible particulate emissions. Rp: Proposed quarterly excursion reporting. ET: Method 9, if required.
F006-F010, P007, P009, P011, P012, P029, P030, P032, P033, P041, P046-P053, P903-P907	Fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.	17-07(B)(1)		n	y	y	y	y	n	M: Daily monitoring of visible particulate emissions. R: Daily record keeping of abnormal emissions. Rp: Proposed quarterly reporting. ET: Method 9, if required.
P901, P902	Visible particulate emissions from EAF roof monitors shall not exceed 20% opacity as a 6-minute average.	17-07(B)(3)		n	y	y	y	y	n	M: Daily monitoring of visible particulate emissions. R: Daily record keeping of abnormal emissions. Rp: Proposed quarterly reporting. ET: Method 9, if required.

F006, P007, P009, P011, P012, P029, P030, P032, P033, P041, P046- P053, P901- P907	PM&MA P plan for control equipment monitoring to ensure proper operation.	15-06(D)		n	y	y	y	n	n	M: Daily monitoring in PM&MAP. R: Daily record keeping according to PM&MAP. Rp: Proposed quarterly reporting.
K001, K002	3.5 lb VOC/gal for metal parts coating	21- 09(U)(1)		n	y	y	y	n	n	M: VOC content of coating, as applied. R: VOC content of coating, as applied. Rp: Excursion reporting. T: Compliance demonstrated through calculations.
K004	3.0 lb VOC/gal. for metal parts coating	21- 09(U)(1)		n	y	y	y	n	n	M: VOC content of coating, as applied. R: VOC content of coating, as applied. Rp: Excursion reporting. ET: Compliance demonstrated through calculations.
P046- P053	Exemption for core sand binder resin	21- 07(G)(9) (h)		n	n	n	n	n	n	M: None. R: None. Rp: None. T: None.
P055	Non- photo- chemically reactive materials	21-07(G)		n	n	n	y	y	n	R: Photochemical reactivity of corewash. Rp: Excursion reporting.
P901, P902	Sulfur dioxide emissions shall not exceed PWRe(0.6 7)30	18-06(D) (2)		n	n	n	n	y	n	ET: If required, Method 6c testing within 6 months of effective date of permit.

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

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 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 requirements. 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.

- C 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.