

# Statement of Basis For Title V Permit

Company Name	Charter Steel	
Premise Number	0387000376	
What makes this facility a Title V facility?	HCl emissions in excess of 10 tons/year	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
none			

? **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 & 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												
P001	18 ppmv HCl		40 CFR, Part 63, CCC	n	y	y	n	n	y	n	y	n	y	y	<p>OR - required to maintain systems for measurement and recording of scrubber makeup water flow rate and recirculation water flow rate, as applicable. This emissions unit is not currently subject to CAM.</p> <p>M/R - the Post 1990 MACT is presumed by USEPA to contain sufficient monitoring to meet the periodic monitoring requirements of Part 70, therefore no further monitoring is necessary.</p> <p>Rp - deviation reporting on parametric monitoring and reporting of scrubber operational data per rule.</p> <p>ET - testing for HCl is required</p> <p>Misc - additional M, R, and Rp requirements as well as delegation of authority under MACT, Subpart CCC.</p>
P001	12.2 lbs HCl/hr, 53.4 tpy	31-05 (A)(3)		n	y	y	n	n	y	n	y	n	y	n	<p>OR - required to maintain systems for measurement and recording of scrubber makeup water flow rate and recirculation water flow rate, as applicable. This emissions unit is not currently subject to CAM.</p> <p>M/R - the Post 1990 MACT is presumed by USEPA to contain sufficient monitoring to meet the periodic monitoring requirements of Part 70, therefore no further monitoring is necessary.</p> <p>Rp - deviation reporting on parametric monitoring and reporting of scrubber operational data per rule.</p> <p>ET - testing for HCl is required</p>

P001	0.6 lb NOx/hr, 2.6 tpy	31-05 (A)(3)		n	y	y	n	n	y	n	y	n	n	n	<p>OR - required to only use natural gas as fuel. This emissions unit is not currently subject to CAM.</p> <p>M/R - natural gas is an inherently clean burning fuel. Use of any other fuel needs to be documented to ensure that an increase in emissions above the allowable is not experienced.</p> <p>Rp - reporting if fuel other than natural gas is used.</p> <p>ET - no testing is required as compliance methods calculations are sufficient to demonstrate compliance with these limits.</p> <p>NOTE: natural gas combustion is the only source of NOx.</p>
P001	0.1 lb PE/hr, 0.4 tpy	31-05 (A)(3)		n	y	y	n	n	y	n	y	n	n	n	<p>OR - required to only use natural gas as fuel. This emissions unit is not currently subject to CAM.</p> <p>M/R - natural gas is an inherently clean burning fuel. Use of any other fuel needs to be documented to ensure that an increase in emissions above the allowable is not experienced.</p> <p>Rp - reporting if fuel other than natural gas is used.</p> <p>ET - no testing is required as compliance methods calculations are sufficient to demonstrate compliance with these limits.</p> <p>NOTE: natural gas combustion is the only source of PE.</p>

P001	1.0 lb CO/hr, 4.4 tpy	31-05 (A)(3)		n	y	y	n	n	y	n	y	n	n	n	OR - required to only use natural gas as fuel. This emissions unit is not currently subject to CAM.  M/R - natural gas is an inherently clean burning fuel. Use of any other fuel needs to be documented to ensure that an increase in emissions above the allowable is not experienced.  Rp - reporting if fuel other than natural gas is used.  ET - no testing is required as compliance methods calculations are sufficient to demonstrate compliance with these limits.  NOTE: natural gas combustion is the only source of CO.
P001	none	17-11 (B)		y	n	n	n	n	n	n	n	n	n	n	OAC rule 3745-17-11(B) , Figure II is not applicable as the UMRE is less than 10 lbs/hr; Table 1 is not applicable as the process weight rate is equal to zero. The particulate emissions only result from natural gas combustion.
P001	none	17-07 (A)		y	n	n	n	n	n	n	n	n	n	n	OAC rule 3745-17-07(A) is not applicable by rule if OAC rule 3745-17-11(B) is not applicable.
P901	0.01 gr PE/dscf, 0.81 lb PE/hr, 3.55 tpy	31-05 (A)(3)		n	y	y	n	n	y	n	y	n	n	n	OR - required to maintain systems for measurement and recording of baghouse pressure drop. This emissions unit is not currently subject to CAM.  M/R - required to record parametric monitoring on baghouse to ensure proper operation.  Rp - deviation reporting on parametric monitoring.  ET - no testing is required as compliance methods calculations are sufficient to demonstrate compliance with these limits.

P901	2.51 tpy fugitive PE	31-05 (A)(3)		n	n	y	y	n	y	y	n	n	n	n	<p>OR - not applicable for fugitive emissions from this unit. This emissions unit is not currently subject to CAM.</p> <p>M/R - required to monitor and record visible emission observations in a log to ensure compliance.</p> <p>St - this monitoring/recordkeeping requirement was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>Rp - required to report visible emissions (log) findings.</p> <p>St - this reporting requirement was not in the PTI was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>ET - no testing is required as compliance methods calculations and M/R/Rp are sufficient to demonstrate compliance with these limits.</p>
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P901	visible stack PE - 5% opacity as a 6-min. ave.	31-05 (A)(3)		n	y	y	y	n	y	y	n	n	n	n	<p>OR - required to maintain systems for measurement and recording of baghouse pressure drop. This emissions unit is not currently subject to CAM.</p> <p>M/R - required to record parametric monitoring on baghouse; required to monitor and record visible stack emission observations in a log. Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology is not yet feasible.</p> <p>St - this monitoring/recordkeeping requirement was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>Rp - deviation reporting on parametric monitoring; required to report visible stack emissions (log) findings.</p> <p>St - this reporting requirement was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>ET - no testing is required as compliance methods calculations and M/R/Rp are sufficient to demonstrate compliance with these limits.</p>
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P901	visible fugitive PE - 20% opacity as a 3-min. ave.	31-05 (A)(3)		n	n	y	y	n	y	y	n	n	n	n	<p>OR - not applicable for fugitive emissions from this unit. This emissions unit is not currently subject to CAM.</p> <p>M/R - required to monitor and record visible fugitive emission observations in a log. Such monitoring provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. Fugitive PE CEMS technology not yet feasible.</p> <p>St - this monitoring/recordkeeping requirement was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>Rp - required to report visible fugitive emissions (log) findings.</p> <p>St - this reporting requirement was not in the PTI was not in the PTI but, in reviewing the Title V permit application, was determined to be necessary to monitor the unit's compliance status.</p> <p>ET - no testing is required as compliance methods calculations and M/R/Rp are sufficient to demonstrate compliance with these limits.</p>
P901 stack	none	17-11 (B)		y	n	n	n	n	n	n	n	n	n	n	<p>This rule establishes an emission limitation which is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). Specifically, the OAC rule 3745-17-11(B) allowable would be higher (less stringent) than the PTI allowable of 0.81 lb PE/hour.</p>
P901 stack	none	17-07 (A)		y	n	n	n	n	n	n	n	n	n	n	<p>This rule establishes an emission limitation which is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3). Specifically, the OAC rule 3745-17-07(A) allowable of "visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule" would be less stringent than the PTI allowable of "visible PE shall not exceed 5% opacity, as a 6-minute average..."</p>

P901 fugitive	none	17-07 (B)		y	n	n	n	n	n	n	n	n	n	n	This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because this source is not located within the geographical areas specified in Appendix A of OAC rule 3745-17-08.
P901 fugitive	none	17-08 (B)		y	n	n	n	n	n	n	n	n	n	n	This emissions unit is exempt from the requirements specified in OAC rule 3745-17-08(B), pursuant to OAC rule 3745-17-08(A)(1), because this source is not located within the geographical areas specified in Appendix A of OAC rule 3745-17-08.

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

? **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 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.
4. 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.