

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Cleveland Engine Plants		
Premise Number	13-18-12-0179		
Number of Non-insignificant Emissions Units	4		
What makes this facility a Title V facility?	VOC, and CO emissions		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y		

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-)	O t h e r							
P245 Dy- na- mo- me- ter	<p>OC: 0.4 lb/hr; 9.6 lb/day; 1.8 TPY</p> <p>NOx: 15.0 lb/hr; 360 lb/day; 30.7 TPY per rolling 12-month</p> <p>CO: 8.1 lb/hr; 194.4 lb/day; 35.5 TPY</p> <p>OC and CO incineration with an interlock at not less than 1400 F for at least 0.3 seconds and a minimum of 95% (by weight) OC and CO destruction efficiencies to demonstrate compliance.</p> <p>Exempt -----> 17-07 Not Applicable -----> 17-11 Exempt -----> 18-06 Not Applicable -----> 21-08 Not Applicable -----> 23-06</p>	31-05		Y	Y	Y	Y	Y	N	<p>OR - Annual gasoline consumption restriction of 192,000 gallons, based upon a rolling, 12-month summation of the gasoline consumption figures. - CAM rule is not currently applicable.</p> <p>M - Facility must operate a continuous temperature recorder and controller which records and controls the combustion chamber temperature to demonstrate compliance.</p> <p>R - Facility shall record daily 3-hour combustion chamber temperature information and capture system information to demonstrate compliance. - Facility shall record monthly gasoline consumption and rolling 12-month summation of gallons of gasoline consumed.</p> <p>Rp - Facility shall submit: 1. Quarterly reports of deviations (excursions) of (a). 3-hour blocks of average combustion chamber temperature, (b) the rolling, 12-month gasoline consumption restriction and 2. Annual total OC, Nox and CO emission reports.</p> <p>ET - Facility shall test for OC, NOx, CO and minimum OC and CO destruction efficiencies to demonstrate compliance.</p> <p>N - There are no miscellaneous requirements.</p>

P264	OC: 5.5 lb/hr; 24.1 TPY	31-05		Y	Y	Y	Y	Y	N	OR - A pilot flame to be maintained in the flare's pilot burner while process is in operation. - Facility must operate an interlocking/monitoring device that automatically prevents the initiation of a new hot test cycle in the event a pilot flame is not detected. - CAM rule is not currently applicable.
Hot										
Test	NOx: 0.4 lb/hr; 1.7 TPY									M - Facility must operate and maintain pilot flame monitor while process is in operation. - Facility must inspect all fittings, maintain records of all repairs and perform weekly checks for any visible particulate emissions from the flare stack.
Ca-rousel	CO: 5.6 lb/hr; 24.5 TPY									R - Facility must maintain a log of the activation of the pilot flame sensor's interlock. - Facility must maintain records of all repairs made to process equipment components.
	0% opacity as a 6-minute average from stack(s)									Rp - Facility must submit quarterly deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly or got extinguished while the emissions unit was in operation. - Facility must submit quarterly deviation (excursion) reports that identify all instances when the pilot flame presence sensor and/or interlocking device allowed the hot test carousel to operate when the enclosed flare pilot flame was not functioning properly or got extinguished when the emissions unit was in operation.
	OC incineration with a minimum of 95% (by weight, for OC) efficient natural gas-fired enclosed flare equipped with an operational flame presence sensor and an interlocking device to demonstrate compliance.									- Facility must submit annual deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the flare stack serving the hot test carousel and (b) describe any corrective actions taken to eliminate the visible particulate emissions
	Exempt ----->	17-07								ET - Facility must test for OC, NOx, CO and minimum enclosed flare OC destruction efficiencies to demonstrate compliance.
	Not Applicable ----->	17-11								N - There are no miscellaneous requirements.
	Exempt ----->	18-06								
	Not Applicable ----->	21-08								
	Not Applicable ----->	23-06								

P281 5 Hot Test Stand ds	<p>OC: 1.1 lbs/hr; 26.4 lbs/day; 4.8 TPY</p> <p>NOx: 0.9 lb/hr; 21.6 lbs/day; 3.9 TPY</p> <p>CO: 3.4 lbs/hr; 81.6 lbs/day; 14.9 TPY</p> <p>0% opacity as a 6-minute average from stack(s)</p> <p>OC incineration with a minimum of 95% (by weight, for OC) efficient natural gas-fired enclosed flare equipped with an operational flame presence sensor and an interlocking device to demonstrate compliance.</p> <p>Exempt -----> 17-07 Not Applicable -----> 17-11 Exempt -----> 18-06 Not Applicable -----> 21-08 Not Applicable -----> 23-06</p>	31-05		Y	Y	Y	Y	Y	N	<p>OR - A pilot flame to be maintained in the flare's pilot burner while process is in operation.</p> <ul style="list-style-type: none"> - Facility must operate an interlocking/monitoring device that automatically prevents the initiation of a new hot test cycle in the event a pilot flame is not detected. - CAM rule is not currently applicable. <p>M - Facility must operate and maintain pilot flame monitor while process is in operation.</p> <ul style="list-style-type: none"> - Facility must inspect all fittings, maintain records of all repairs and perform weekly checks for any visible particulate emissions from the flare stack. <p>R - Facility must maintain a log of the activation of the pilot flame sensor's interlock.</p> <ul style="list-style-type: none"> - Facility must maintain records of all repairs made to process equipment components. <p>Rp - Facility must submit quarterly deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly or got extinguished while the emissions unit was in operation.</p> <ul style="list-style-type: none"> - Facility must submit quarterly deviation (excursion) reports that identify all instances when the pilot flame presence sensor and/or interlocking device allowed the hot test carousel to operate when the enclosed flare pilot flame was not functioning properly or got extinguished when the emissions unit was in operation. - Facility must submit annual deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the flare stack serving the hot test stands and (b) describe any corrective actions taken to eliminate the visible particulate emissions. <p>ET - Facility must test for OC, NOx, CO and minimum enclosed flare OC destruction efficiencies to demonstrate compliance while P281 and P0283 are both in operation simultaneously because they share the enclosed flare.</p> <p>N - There are no miscellaneous requirements.</p>
---	--	-------	--	---	---	---	---	---	---	---

P283	OC: 0.2 lb/hr; 0.88 TPY	31-05		Y	Y	Y	Y	Y	N	OR - A pilot flame to be maintained in the flare's pilot burner while process is in operation. - Facility must operate an interlocking/monitoring device that automatically prevents the initiation of a new hot test cycle in the event a pilot flame is not detected. - CAM rule is not currently applicable. M - Facility must operate and maintain pilot flame monitor while process is in operation. - Facility must inspect all fittings, maintain records of all repairs and perform weekly checks for any visible particulate emissions from the flare stack. R - Facility must maintain a log of the activation of the pilot flame sensor's interlock. - Facility must maintain records of all repairs made to process equipment components. Rp - Facility must submit quarterly deviation (excursion) reports that identify all periods during which the pilot flame was not functioning properly or got extinguished while the emissions unit was in operation. - Facility must submit quarterly deviation (excursion) reports that identify all instances when the pilot flame presence sensor and/or interlocking device allowed the hot test carousel to operate when the enclosed flare pilot flame was not functioning properly or got extinguished when the emissions unit was in operation. - Facility must submit annual deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the flare stack serving the hot test stand and (b) describe any corrective actions taken to eliminate the visible particulate emissions. ET - Facility must test for OC, NOx, CO and minimum enclosed flare OC destruction efficiencies to demonstrate compliance while P281 and P0283 are both in operation simultaneously because they share the enclosed flare. N - There are no miscellaneous requirements.
One										
Hot	NOx: 0.13 lb/hr; 0.57 TPY									
Test	CO: 0.42 lb/hr; 1.84 TPY									
Stand	0% opacity as a 6-minute average from stack(s) OC incineration with a minimum of 95% (by weight, for OC) efficient natural gas-fired enclosed flare equipped with an operational flame presence sensor and an interlocking device to demonstrate compliance. Exempt -----> 17-07 Not Applicable -----> 17-11 Exempt -----> 18-06 Not Applicable -----> 21-08 Not Applicable -----> 23-06									

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.

f:\wpdocs\sobCEPs.wpd

i:\Envr\apc\TitleV\sobCEPs.wpd