

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Commercial Intertech		
Premise Number	02-50-11-0316		
Number of Non-insignificant Emissions Units	15		
What makes this facility a Title V facility?	PE, OC		
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			

- **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.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F001	No visible particulate emissions except for 6 minutes during any 60 minute period	17-07 (B)(4)		N	Y	Y	Y	N	N	
F001	RACM	17-08 (B), (B)(8), (B)(9)		N	Y	Y	Y	N	N	
F001	No visible particulate emissions except for 13 minutes during any 60 minute period	17-07 (B)(5)		Y	Y	Y	Y	N	N	OR - When a dust suppressant is used for controlling fugitive dust from the unpaved road segments and parking areas, the following restrictions apply: a. The permittee shall certify or possess certification that all dust suppressant used to control fugitive dust meet the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261. b. The permittee shall not apply used oil as defined in OAC rule 3734-279-01 (A)(12) as a dust suppressant. c. The dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, section 6111.
F001	RACM	17-08 (B), (B)(2)		Y	Y	Y	Y	N	N	OR - When a dust suppressant is used for controlling fugitive dust from the unpaved road segments and parking areas, the following restrictions apply: a. The permittee shall certify or possess certification that all dust suppressant used to control fugitive dust meet the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261. b. The permittee shall not apply used oil as defined in OAC rule 3734-279-01 (A)(12) as a dust suppressant. c. The dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, section 6111.

F002 - F003	See Comments	31-05		N	Y	Y	Y	N	N	a. Only non-oily scrap shall be charged for the purposes of melting in the electric induction furnace. b. Electric induction furnaces F002 and F003 shall not be operated simultaneously for scrap melting.
F002 - F003	Particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	
F002 - F003	See Comments	17-08 (B)		N	Y	Y	Y	N	N	a. Only non-oily scrap shall be charged for the purposes of melting in the electric induction furnace.
F007 - F008	4.4 tons per year PE	31-05		N	Y	Y	Y	Y	N	
F007 - F008	0.01 grains/dscf	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
F007 - F008	0.53 lb/hr fugitive PE	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
F007 - F008	0.35 lb/hr OC	31-05		N	N	N	N	N	N	These numbers are based upon uncontrolled emissions from metal pouring operations which do not require monitoring, reporting, or recordkeeping.
F007 - F008	10.03lb/hr CO	31-05		N	N	N	N	N	N	These numbers are based upon uncontrolled emissions from metal pouring operations which do not require monitoring, reporting, or recordkeeping.

F007 - F008	Particulate matter emissions shall not exceed 20% opacity as a six-minute average.	17-07 (A)		N	Y	Y	Y	N	N	
F007 - F008	Fugitive particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		Y	Y	Y	Y	N	N	
F007 - F008		17-08 (B)		N	Y	Y	Y	N	N	
F007 - F008	See Comments	17-11		Y	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05.
F012 - F013	0.242 lb/hr PE	31-05		N	Y	Y	Y	N	N	
F012 - F013	6.36 lb/hr OC	31-05		N	Y	Y	Y	N	N	
F012 - F013	See Comments	17-08 (B)		N	Y	Y	Y	N	N	a. No control measures are required.
F012 - F013	See Comments	21-07 (G)(2)		N	Y	Y	Y	N	N	a. The emissions unit shall not employ organic liquids which are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5).
F012 - F013	Particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	

F014	8.8 tons per year PE	31-05		N	Y	Y	Y	N	N	OR - The maximum annual production rate for this emissions unit shall not exceed 4380 tons of inoculated metal, based upon a rolling, twelve- month summation of the production rates.
F014	20.0 lb/hr PE	31-05		N	Y	Y	Y	N	N	
F014	Particulate matter emissions shall not exceed 5% opacity as a three-minute average.	31-05		N	Y	Y	Y	N	N	
F014	See Comments	17-07 (B)		N	Y	Y	Y	N	N	a. Less stringernt than limit from OAC rule 3745-31-05.
F014	See Comments	17-08 (B)		N	Y	Y	Y	N	N	a.The use of a Tundish ladle.
K001	Maximum daily coating usage not to exceed 10 gallons of coating in any one day	21-09 (U)(2) (e)(ii)		N	Y	Y	Y	N	N	
K001	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rulee.	17-07 (A)		Y	Y	Y	Y	N	N	OR - The permittee shall use dry filters whenever this emissions unit is in operation for the control of overspray.
K001	0.551 lb/ hr PE	17-11		Y	Y	Y	Y	N	N	OR - The permittee shall use dry filters whenever this emissions unit is in operation for the control of overspray.

P015	0.01 grains/dscf	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P015	1.97 tons per year	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P015	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P015	See Comments	17-11		Y	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05. b. OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P020	0.01 grains/dscf	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P020	4.69 tons per year PE	31-05		Y	Y	Y	Y	N	N	
P020	0.59 tons per year fugitive PE	31-05		Y	Y	Y	Y	N	N	
P020	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

P020	Fugitive particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	
P020	See Comment	17-08 (B)		N	Y	Y	Y	N	N	a. The collection efficiency must be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. The collection efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed twenty-percent, as a three-minute average.
P020	See Comments	17-11		Y	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05. b. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P030	0.01 grains/dscf and 6.44 tons per year	31-05		Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P030	6.44 tons per year PE	31-05		Y	Y	Y	Y	Y	N	
P030	7.03 tons per year fugitive PE	31-05		N	Y	Y	Y	N	N	
P030	6.03 lb/hr OC	31-05		N	N	N	N	NY	N	
P030	10.0 lb/hr CO	31-05		N	N	N	N	N	N	

P030	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P030	Fugitive particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	
P030	See Comment	17-08 (B)		N	Y	Y	Y	N	N	a. The collection efficiency must be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. The collection efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed twenty-percent, as a three-minute average.
P030	See Comments	17-11		Y	Y	Y	Y	Y	N	a. Less stringent than limit from OAC rule 3745-31-05. b. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P033	0.01 grains/dscf	31-05		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

P033	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		Y	Y	Y	Y	N	N	
P033	See Comments	17-11		Y	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05. b. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P036	0.04 grains/dscf	31-05		N	Y	Y	Y	N	N	
P036		31-05		N	Y	Y	Y	N	N	
P036	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		N	Y	Y	Y	N	N	
P036	Fugitive particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	a. Only non-oily scrap shall be charged to the preheater. b. All scrap materials must be processed within the building.

P036	See Comments	17-08 (B)		N	Y	Y	Y	N	N	a. Only non-oily scrap shall be charged to the preheater. b. All scrap materials must be processed within the building.
P036	See Comments	17-11		N	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05.
P901	0.01 grains/dscf	31-05		Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P901	Particulate matter emissions shall not exceed 20% opacity as a six-minute average, except as provided by the rule.	17-07 (A)		Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.
P901	Fugitive particulate matter emissions shall not exceed 20% opacity as a three-minute average.	17-07 (B)		N	Y	Y	Y	N	N	
P901	See Comment	17-08 (B)		N	Y	Y	Y	N	N	a. The collection efficiency must be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design. The collection efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed twenty-percent, as a three-minute average.
P901	See Comments	17-11		N	Y	Y	Y	N	N	a. Less stringent than limit from OAC rule 3745-31-05. b. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

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 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 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.

- 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.