

# Statement of Basis For Title V Permit

Company Name	Eljer Plumbingware, Inc.	
Premise Number	17-15-09-0188	
Number of Non-insignificant Emissions Units	28	
What makes this facility a Title V facility?	CO, NO <sub>x</sub> , PM <sub>10</sub>	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	

- **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 emissions except for 6 min. during any 60 min. period	17-07(B)(4)	N	N	Y	Y	Y	N	N	
F001	No visible emissions except for 13 min. during any 60 min. period	17-07(B)(5)	N	Y	Y	Y	Y	N	N	OR - The permittee shall not apply used oil to the unpaved roadways and parking areas as a dust suppressant.
F001, F003, F010, F011, P001, P013, P025, P028, P038, P039, P040, P042, P046, P063, P064, P065, P066, P901, P902	RACM	17-08(B)	N	N	Y	Y	Y	N	N	
F003, F010	11.9 lb/hr PE	17-11(B)(1)	N	N	Y	Y	Y	Y	N	
F001, F003, F010, F011, P001, P013, P025, P028, P038, P039, P040, P042, P046, P047, P048, P049, P063, P064, P066, P067, P901, P902, R001, R002	20% opacity	17-07(A)(1)	N	N	Y	Y	Y	N	N	

F001, F003, F010, F011, P001, P013, P025, P028, P038, P039, P040, P042, P046, P054, P055, P056, P063, P064, P066, P901, P902	20% opacity as a 3 min. average	17-07(B)	N	N	Y	Y	Y	N	N	
F003, F010	87.0 lb/hr SO2	18-06(E)(2)	N	N	N	N	N	N	N	M, R, Rp - Not required because the maximum uncontrolled SO2 emissions from this emissions unit cannot exceed the allowable emissions limit. ET - If required, emissions testing will be performed.
F011	141.3 lb/hr SO2	18-06(E)(2)	N	N	N	N	N	N	N	M, R, Rp - Not required because the maximum uncontrolled SO2 emissions from this emissions unit cannot exceed the allowable emissions limit. ET - If required, emissions testing will be performed.
F011	19.3 lb/hr PE	17-11(B)(1)	N	N	Y	Y	Y	Y	N	
P001	4.55 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas shall be burned in this emissions unit.
P013	4.66 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas shall be burned in this emissions unit.
P025	16.0 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P028	15.6 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses (CBDC-15, CBDC-16, CBDC-17, CBDC-28 and CBDC-29) shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation. The pressure drop across the baghouse (CBDC-23) shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation.
P038	18.1 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P039	17.7 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P040	7.78 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation. ET - If required, emissions testing will be performed.

P042	58.6 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P046	33.2 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P047, P048, P049	4.26 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - Only natural gas shall be burned in this emissions unit.
P054, P055	RACM	17-08(B)	N	N	Y	Y	Y	Y	Y	Misc. - This emissions unit is currently not employing reasonably available control measures (RACM) for this emissions unit, which is a violation of OAC rule 3745-17-08. The permittee shall submit a control plan and compliance schedule for this emissions unit, within 2 months after issuance of the permit, that will achieve and thereafter maintain compliance with OAC rule 3745-17-08 within 6 months after issuance of the permit.
P056	RACM	17-08(B)	N	N	Y	Y	Y	Y	N	
P063	58.2 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P064	7.41 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation.
P065	0.37 lb/hr PE (stack)	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The pressure drop across the baghouses shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation. OR - The maximum annual operating hours for this emissions unit shall not exceed 5,730 hours per year. ET - If required, emissions testing will be performed.
P065	1.06 tpy PE (stack)	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The pressure drop across the baghouses shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation. OR - The maximum annual operating hours for this emissions unit shall not exceed 5,730 hours per year. ET - If required, emissions testing will be performed.
P065	1.94 lb/hr PE (fugitive)	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P065	5.57 tpy PE (fugitive)	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)

P065	10% opacity as a 6 min. average (stack)	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P065	10% opacity as a 6 min. average (fugitive)	N	Y	N	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3)
P066	5.38 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	Y	N	OR - The pressure drop across the baghouses shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.
P067	0.310 lb/MMBtu of actual heat input	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-17-11(B)(5)(a) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. ET - If required, emissions testing will be performed.
P067	18.3 lb/hr and 22.0 tpy NOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(D) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. ET - If required, emissions testing will be performed.
P067	3.95 lb/hr and 4.74 tpy CO	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. ET - If required, emissions testing will be performed.
P067	1.21 lb/hr and 1.45 tpy SOx	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. OR - The quality of fuel burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation. ET - If required, emissions testing will be performed.
P067	1.46 lb/hr and 1.75 tpy OC	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. ET - If required, emissions testing will be performed.
P067	1.55 tpy PE	N	Y	Y	Y	Y	Y	N	N	Basis - OAC rule 3745-31-05(A)(3) OR - The maximum annual operating hours for this emissions unit shall not exceed 2,400 hours per year, based on a rolling, 12-month summation. ET - If required, emissions testing will be performed.

P901, P902	23.2 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	N	N	OR - The pressure drop across the baghouses shall be maintained within the range of 3 to 4 inches of water while the emissions unit is in operation. OR - The permittee shall not operate Cupola #1 (P901) and Cupola #3 (P902) simultaneously. ET - If required, emissions testing will be performed.
P901, P902	243.0 lb/hr SO2	18-06(E)(2)	N	N	N	N	N	N	N	M, R, Rp - Not required because the maximum uncontrolled SO2 emissions from this emissions unit cannot exceed the allowable emissions limit. ET - If required, emissions testing will be performed.
R001	1.15 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	N	N	OR - Only natural gas shall be burned in this emissions unit. OR - The permittee shall operate the water curtain whenever this emissions unit is in operation. ET - If required, emissions testing will be performed.
R002	1.10 lb/hr PE	17-11(B)(1)	N	Y	Y	Y	Y	N	N	OR - Only natural gas shall be burned in this emissions unit. OR - The permittee shall operate the water curtain whenever this emissions unit is in operation. ET - If required, emissions testing will be performed.

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 comments. 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.