

## Statement of Basis For Title V Permit

Company Name	Elkem Metals Company, L. P.	
Premise Number	02-04-01-0003	
Number of Non-insignificant Emissions Units	10	
What makes this facility a Title V facility?	PM, NO <sub>x</sub> & SO <sub>2</sub>	
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							
P001, P006, P008- P010, P025, P027, P905 & P906	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
P905 & P906	20% opacity as a 6-minute average	17-07(B) (3)		N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
F001	≤6 min. of VE per 60 min. observation	17-07(B) (4)		N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
F001	≤13 min. of VE per 60 min. observation	17-07(B) (5)		N	Y	Y	Y	N	N	ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required.
F001, P905 & P906	Use of RACM to minimize visible fugitive dust	17-08(B)		Y	Y	Y	Y	N	N	OR - For F001, use of used oil or hazardous waste material as dust suppressants is not permitted. For P905 & P906: a) use of hoods, fans, etc to capture & control fugitive dust, and b) ≤ 0.030 grains PE/dscf per rule.  ET - Permittee shall demonstrate compliance through the monitoring and record keeping requirements. Emission testing is not required for F001.
P001	42.6 lbs PM/hr	17-11		Y	Y	Y	Y	Y	N	OR/Rp- Differential pressure drop restriction on baghouse. M/R- Diff. pressure drop on baghouse & visual inspection of cyclone(s).
P006	30.5 lbs PM/hr	17-11		Y	Y	Y	Y	N	N	OR/M/R/Rp - Differential pres. drop on baghouse. ET - Permittee shall demonstrate compliance through estimate of actual worst case emission rate.

P008	46.3 lbs PM/hr	17-11		Y	Y	Y	Y	N	N	OR/M/R/Rp - Differential pres. drop on baghouse. ET - Permittee shall demonstrate compliance through estimate of actual worst case emission rate.
P009	42.6 lbs PM/hr	17-11		Y	Y	Y	Y	Y	N	OR/Rp- Differential pressure drop restriction on baghouse. M/R- Diff. pressure drop on baghouse & visual inspection of cyclone(s).
P010	42.6 lbs PM/hr	17-11		Y	Y	Y	Y	Y	N	OR/Rp- Differential pressure drop restriction on baghouse. M/R- Diff. pressure drop on baghouse & visual inspection of cyclone(s).
P025	30.5 lbs PM/hr	17-11		Y	Y	Y	Y	N	N	OR/M/R/Rp - Differential pres. drop on baghouses. ET - Permittee shall demonstrate compliance through estimate of actual worst case emission rate.
P027	46.3 lbs PM/hr	17-11		Y	Y	Y	Y	N	N	OR/Rp - Differential pres. drop on baghouses. M/R - Differential pres. drop on baghouses; visual inspection of cyclones. ET - Permittee shall demonstrate compliance through estimate of actual worst case emission rate.
P905	24.6 lbs PM/hr	17-11		Y	Y	Y	Y	Y	N	OR/M/R/Rp- Differential pressure drop restriction on baghouse & scrubber & water flow rate through scrubber.
P906	24.6 lbs PM/hr	17-11		Y	Y	Y	Y	Y	N	OR/M/R/Rp- Differential pressure drop restriction on baghouse & scrubber & water flow rate through scrubber.
P009 & P010	126 lbs SO <sub>2</sub> /hr	18-10(H)		N	N	N	N	Y	N	OR-No SO <sub>2</sub> control equipment employed.
P025	223 lbs SO <sub>2</sub> /hr	18-06 (D)(2)		N	N	N	N	N	N	OR-No SO <sub>2</sub> control equipment employed. ET - Permittee shall demonstrate compliance through estimate of actual worst case emission rate.
P905 & P906	180 lbs SO <sub>2</sub> /hr	18-06 (D)(2)		N	N	N	N	Y	N	OR-No SO <sub>2</sub> control equipment employed.

EU = emissions unit id-

OR = operational restriction

M = 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 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 each column where “N” is specified, there should be a brief explanation in the “Comments” section. 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, record keeping, 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.
- 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.