

Statement of Basis For Title V Permit

Company Name	Ferro Corporation Frit Plant	
Premise Number	13-18-17-0235	
Number of Non-insignificant Emissions Units	36	
What makes this facility a Title V facility?	NOx, particulate emissions (PE)	
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							
P032	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P032	0.88 lb/ton PE	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR -Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P033	5% opacity from stack	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR - Permittee shall operate three baghouses with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P033	0.01 grain/dscf PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate three baghouses with this emissions unit. ET - Permittee shall demonstrate compliance through material balance calculations. Emission testing is not required.
P034	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate two baghouses with this emissions unit. ET - Permittee shall demonstrate compliance through material balance calculations. Emission testing is not required.
P034	0.39 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate two baghouses with this emissions unit. ET - Permittee shall demonstrate compliance through material balance calculations. Emission testing is not required.
P053	5% opacity	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit.required ET - Permittee shall demonstrate compliance through the VE testing requirement. Emission testing is not required.
P053	0.01 gr/dscf PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through material balance calculations. Emission testing is not required.
P057	5% opacity at all times	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through the VE testing requirement. Emission testing is not required.

P057	0.1 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through material balance calculations. Emission testing is not required.
P061	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P061	0.05 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P063	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P063	0.05 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required
P064	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P064	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P064- P069	0.30 TPY lead	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through PM calculation in permit. No emissions testing required.
P065	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P065	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.

P066	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P066	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P067	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P067	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required
P068	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required. .
P068	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P069	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required. .
P069	0.01 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P901	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P901	47.7 lbs/hr PE	17-11		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.

P901	0.04 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P901	20% opacity as a 3-minute average	17-07(B)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P902	22.6 lbs/hr PE	17-11		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P902	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P902	20% opacity as a 3-minute average	17-07(B)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P903	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P903	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P903	2.58 lbs/hr PE	17-11		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P906	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.

P906	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P908	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to a 16,000 lb/hr PWR for all smelters at facility, burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P908	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P909	4.76 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P909	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P910	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P910	4.37 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P911	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P911	4.10 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P912	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.

P912	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P913	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P913	5.13 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P914	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P914	5.13 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P915	10% opacity as a 6-minute average	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse and HEPA filter with this emissions unit. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P915	1.07 lb/hr PE	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse and HEPA filter with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P915	0.64 lb/hr lead	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR -Permittee shall operate a baghouse and HEPA filter with this emissions unit. ET - Permittee shall demonstrate compliance through calculation in permit. No emissions testing required.
P917	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P917	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.

P917	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse system when emissions unit is in operation.
P918	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P918	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P918	0.01 grain/dscf PE	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR- Operation of baghouse system when emissions unit is in operation.
P920	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P920	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P920	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.
P921	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P921	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P921	4.76 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.

P922	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P922	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P922	4.37 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation..
P923	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P923	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P923	4.10 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.
P924	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P924	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P924	3.82 lb/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse system when emissions unit is in operation.
P925	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.

P925	0.88 lb/ton PE	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR - Permittee is limited to burning natural gas as fuel and scrubber PH 6-10 and pressure drop of no less than 30 in of water.
P926	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P926	20% opacity as a 3-minute average	17-07(B)		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P926	0.01 gr/dscf PE	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.
P927	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P927	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P927	3.82 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.
P929	20% opacity as a 6-minute average	17-07		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P929	20% opacity as a 3-minute average	17-08		Y	Y	Y	Y	N	N	OR- Operation of baghouse system when emissions unit is in operation. ET - Permittee shall demonstrate compliance through VE requirement. No emissions testing required.
P929	5.13 lbs/hr PE	17-11		Y	Y	Y	Y	Y	N	OR- Operation of baghouse when emissions unit is in operation.

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.