

Statement of Basis For Title V Permit

Company Name	Fisher Titus Hospital	
Premise Number	0339020038	
What makes this facility a Title V facility?	40 CFR Part 62, Subpart HHH	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None			

▼ **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.

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

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
N003	0.275 lb PE/hr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	1.2 ton PE/yr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.018 tpy As	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.

N003	0.0024 lb Be/hr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.0105 ton Be/yr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.0066 ton Cr/yr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.033 ton Ni/yr	31-05 (A)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.10 lb PE/100 lbs charged	75-02 (B)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.

N003	0.0042 lb As/hr	75-02 (F)(1)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.010 lb Cd/hr	75-02 (F)(3)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.0015 lb Cr/hr	75-02 (F)(4)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.068 lb Pb/hr	75-02 (F)(5)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.011 lb Hg/hr	75-02 (F)(6)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.

N003	0.0076 lb Ni/hr	75-02 (F)(7)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	5% opacity (not to exceed 10%)	75-02 (G)		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.015 gr PE/dscf	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	40 ppmv CO	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	55 gr/billion dscf... dioxins/ furans	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.

N003	100 ppmv HCl...	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	55 ppmv SO2	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	250 ppmv NOx	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.52 gr Pb/mdscf...	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
N003	0.07 gr Cd/mdscf...	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.

N003	0.24 gr Hg/mdscf..	40 CFR Part 62, HHH		n	y	y	y	n	y	y	y	n	y	n	OR - There are 18 operational procedures and restrictions which have been included in the permit which are included in the MWI rules and serve the purpose of minimizing the emissions. M - Permittee shall operate and maintain a continuous temperature monitor and recorder on the incinerator. Proper temperature shall indicate proper operation of the unit.
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EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the 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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- 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. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the

“Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.