

# Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	General Electric - Bucyrus Lamp Plant	
Premise Number	03-17-01-0010	
Number of Non-insignificant Emissions Units	20	
What makes this facility a Title V facility?	VOC	
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	
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							
K002 P003 P006 P007 P008 P018 P019 P020 P021	3.5 lb VOC per gallon	21-09 (U)(1) (c)		N	N	Y	Y	N	N	M - No monitoring requirements are necessary to show compliance.  ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.
K002 R001	4.0 lb/hr VOC 1.17 lb/hr OC	31-05		N	N	N	N	N	N	M, R, Rp - The emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P006 P007 P008 P015	0.3 lb/hr PE* 0.3 lb/hr PE* 0.32 lb/hr PE* 0.072 lb/hr PE	31-05		N	N	N	N	N	Y	*excluding mercury Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
P006 P007	0.012 lb/hr VOC	31-05		N	N	N	N	N	Y	Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
P006 P007 P008	7.44 lb/hr SO2 (each)  2.35 lb/hr SO2	31-05		N	N	N	N	N	N	M, R, Rp - The emission limitation reflects the potential to emit for this emissions unit; therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P006 P007	0.00048 lb/hr Hg (each)	31-05		Y	Y	Y	Y	N	Y	OR - steam regeneration rate parametric monitoring for carbon adsorber Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.

P006 P007 P008	see OR in comments	21-07 (G)		Y	Y	Y	Y	N	N	OR - cannot use photochemically-reactive materials. ET - No stack testing is required. Compliance can be demonstrated based on the record keeping requirements.
P008	0.025 lb/hr Hg	31-05		Y	Y	Y	Y	N	N	OR - steam regeneration rate parametric minimum for carbon adsorber ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P008	1.68 lb/hr NH3	31-05		N	N	N	N	N	Y	Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
P009	0.25 lb/hr PE	31-05		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P009 P013 P022	2.0 lb/hr NOx 1.56 lb/hr NOx	31-05		N	N	N	N	N	Y	Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
P009	0.1 lb/hr SO2	31-05		N	N	N	N	N	Y	Misc - Emission rate was incorrectly represented for original Permit to Install (PTI). The company must obtain a PTI modification to correct this issue.
P009 P013 P014 P022	0.3 lb/hr HCl 0.37 lb/hr HCl 0.42 lb/hr HCl	31-05		Y	Y	Y	Y	Y	N	OR - several parameters established for scrubber operation
P013 P014 P022	0.38 lb/hr PE 1.0 lb/hr PE	31-05		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P013 P022	0.04 lb/hr SO2	31-05		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY

P013 P022	0.91 lb/hr VOC	31-05		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P014	0.47 lb/hr tin	31-05		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P015	2.68 lb/hr NOx	31-05		N	N	N	N	N	N	M, R, Rp - The limit is based on the potential to emit for these emissions units using AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R001	0.1 lb/hr PE	31-05		Y	Y	Y	Y	N	N	OR - Pressure drop operational range across the baghouse required. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
R001	5% opacity	31-05		N	Y	Y	Y	N	N	ET - None normally required for opacity.

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.