

Statement of Basis For Title V Permit

Company Name	General Electric Aircraft Engines - Peebles Facility	
Premise Number	07-01-00-0001	
What makes this facility a Title V facility?	Exceeded the 100 TPY threshold for NOx and CO	
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	
A.1	N	40 CFR 63 Subpart P P P P P	In accordance with 40 CFR Parts 63.9290(b) and 63.9290(d), existing engine test cells/stands and new or reconstructed engine test cells/stands located at a major source which is used exclusively for testing combustion turbine engines, respectively, do not have to meet the requirements of 40 CFR Part 63, Subpart P P P P P and of 40 CFR Part 63, Subpart A.
A.2	N	40 CFR 63 Subpart Y Y Y Y	The permittee is subject to NESHAP for Stationary Combustion Turbines, 40 CFR Part 63, Subpart Y Y Y Y. However, in accordance with 40 CFR 63.6090(b)(4), existing Turbines do not have to meet the requirements of 40 CFR Part 63, Subpart Y Y Y Y and of 40 CFR Part 63, Subpart A.
A.3-A.8	N	40 CFR 63 Subpart G G	This facility performs hand-wipe cleaning operations. The Title V facility terms and conditions include monitoring/recordkeeping requirements, reporting requirements, and testing requirements.
A.10	25-03	N	This facility is subject to the applicable requirements specified in OAC 3745-25. In accordance with the Ohio EPA Engineering guide #64, the emission control actions programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
A.11	N	40 CFR Part 82	The permittee shall comply with all applicable provisions specified in 40 CFR Part 82, Subparts B and F as related to the operations at this facility.

C **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												
B002 B003	Compliance with this rule included compliance with OAC rule 3745-17-08, 18-06(E)(2), 21-08(B), 23-06(B)	N	3745-31-05 PTI 07-042 (B002) PTI 07-060 (B003)	Y	N	N	N	N	N	N	N	N	N	Y	ND- The SO2 emissions from this unit are due solely to the combustion of liquid jet fuels. Pursuant to OAC rule 3745-18-01(B)(13), the liquid jet fuels and combustion air are not considered to be part of the emissions units total process weight rate which is used in establishing the allowable SO2 limit. Therefore, a SO2 emission limitation has not been established for this emission unit. M,R,Rp,ET - no emissions limits to demonstrate compliance with.
	None (see comments section)	OAC rule 3745-17-08	N	Y	N	N	N	N	N	N	N	N	N	N	ND - This facility is not located in an Appendix A areas described in OAC rule 3745-17-08; therefore, OAC rule 3745-17-07(B) and 3745-17-08(B) do not apply to the fugitive emissions from this unit. M,R,Rp,ET - this rule does not apply to this EU therefore, no compliance demonstration necessary.

	All new CO sources shall minimize emissions by use of best available control technology and operating practices	OAC rule 3745-21-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp ET - The design of the emissions unit and technology associated with current operating practices will satisfy the "best available control technologies and operating practices" required pursuant to OAC rule 3745-21-08.
	All new NOx sources shall minimize emissions by use of best available control technology and operating practices	OAC rule 3745-23-06(B)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp ET - The design of the emissions unit and technology associated with current operating practices will satisfy the "best available control technologies and operating practices" required pursuant to OAC rule 3745-23-06.
	See comments section	OAC rule 3745-18-06(E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The SO2 emissions from this unit are due solely to the combustion of liquid jet fuels. Pursuant to OAC rule 3745-18-01(B)(13), the liquid jet fuels and combustion air are not considered to be part of the emissions units total process weight rate which is used in establishing the allowable SO2 limit. Therefore, a SO2 emission limitation has not been established for this emission unit. M,R,Rp,ET - no emissions limits to demonstrate compliance with.
B003 B008 B009	None (see comment section)	OAC rule 3745-17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The uncontrolled mass rate of particulate emissions is less than 10 lb/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table 1 of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. M,R,Rp,ET - this rule does not apply to this EU therefore, no compliance demonstration necessary. Misc- OEPA and USEPA are working to exempt engine test cells from OAC rule 3745-17 and 3745-17 through rulemaking/revision.

	None (see comment section)	OAC rule 3745-17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - This EU is exempt from the visible emissions limitations pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M,R,Rp,ET - this rule does not apply to this EU therefore, no compliance demonstration necessary.
	See comments section	OAC rule 3745-18-06(E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The SO2 emissions from this unit are due solely to the combustion of liquid jet fuels. Pursuant to OAC rule 3745-18-01(B)(13), the liquid jet fuels and combustion air are not considered to be part of the emissions units total process weight rate which is used in establishing the allowable SO2 limit. Therefore, a SO2 emission limitation has not been established for this emission unit. M,R,Rp,ET - no emissions limits to demonstrate compliance with.
F007 F010	25 lbs/hr of PM/PM ₁₀ 200 lbs/hr of SO ₂ 5900 lbs/hr of Nox 450 lbs/hr of HC 350 lbs/hr of CO 6.1 TPY of PM/PM ₁₀ , rolling 12-month total 16.6 TPY of SO ₂ , rolling 12-month total 389 TPY of NOx, rolling 12-month total 26.7 TPY of HC, rolling 12-month total 300 TPY of CO, rolling 12-month total	N	3745-31-05 PTI 07-385	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	OR - data capture rate for operating parameters in A.III.1.a shall be no less than 95%. CAM does not apply ET - Emissions from engine testing are calculated from fuel flow and emission curves. St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added Misc - Jet engine test stand B005 shall remain shut down. OEPA and USEPA are working to exempt engine test cells from OAC rule 3745-17 and 3745-17 through rulemaking/revision.

No VEs in excess of 10% opacity as a six-minute average in a 60 minute observation period	N	3745-31-05 PTI 07-385	N	N	Y	Y	N	Y	Y	Y	Y	Y	N	St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added
NA	N	40 CFR 52.21	N	N	N	N	N	N	N	N	N	N	N	BACT for NOx and CO has been determined to be no control.
All new Nox and CO sources shall minimize emissions by use of best available control technology and operating practices	OAC rule 3745-21-08(B) and OAC rule 3745-21-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp ET - The design of the emissions unit and technology associated with current operating practices will satisfy the "best available control technologies and operating practices" required pursuant to OAC rule 3745-23-06/21-08.
See comments section	OAC rule 3745-18-06(E)	N	N	N	N	N	N	N	N	N	N	N	N	The SO2 emissions limitation specified by this rule is less stringent than the SO2 limitations established pursuant to OAC rule 3745-31-05(A)(3).

F012	25 lbs/hr of PM/PM ₁₀ 200 lbs/hr of SO ₂ 5900 lbs/hr of Nox 450 lbs/hr of HC 350 lbs/hr of CO 5 TPY of PM/PM ₁₀ , rolling 12-month total 13.7 TPY of SO ₂ , rolling 12-month total 320 TPY of NOx, rolling 12-month total 21.9 TPY of HC, rolling 12-month total 246.8 TPY of CO, rolling 12-month total	N	3745-31-05 PTI 07-385	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	OR - data capture rate for operating parameters in A.III.1.a shall be no less than 95%. CAM does not apply ET - Emissions from engine testing are calculated from fuel flow and emission curves. St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added Misc - Jet engine test stand B005 shall remain shut down. OEPA and USEPA are working to exempt engine test cells from OAC rule 3745-17 and 3745-17 through rulemaking/revision.
	No VEs in excess of 10% opacity as a six-minute average in a 60 minute observation period	N	3745-31-05 PTI 07-385	N	N	Y	Y	N	Y	Y	Y	Y	Y	N	St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added
NA		N	40 CFR 52.21	N	N	N	N	N	N	N	N	N	N	N	BACT for NOx and CO has been determined to be no control.

	All new Nox and CO sources shall minimize emissions by use of best available control technology and operating practices	OAC rule 3745-21-08(B) and OAC rule 3745-21-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp ET - The design of the emissions unit and technology associated with current operating practices will satisfy the "best available control technologies and operating practices" required pursuant to OAC rule 3745-23-06/21-08.
	See comments section	OAC rule 3745-18-06(E)	N	N	N	N	N	N	N	N	N	N	N	N	The SO2 emissions limitation specified by this rule is less stringent than the SO2 limitations established pursuant to OAC rule 3745-31-05(A)(3).
F013	25 lbs/hr of PM/PM ₁₀ 200 lbs/hr of SO ₂ 5900 lbs/hr of Nox 450 lbs/hr of HC 350 lbs/hr of CO 5.5 TPY of PM/PM ₁₀ , rolling 12-month total 15 TPY of SO ₂ , rolling 12-month total 350 TPY of NOx, rolling 12-month total 24 TPY of HC, rolling 12-month total 269.9 TPY of CO, rolling 12-month total	N	3745-31-05 PTI 07-385	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	OR - data capture rate for operating parameters in A.III.1.a shall be no less than 95%. CAM does not apply ET - Emissions from engine testing are calculated from fuel flow and emission curves. St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added Misc - Jet engine test stand B005 shall remain shut down. OEPA and USEPA are working to exempt engine test cells from OAC rule 3745-17 and 3745-17 through rulemaking/revision.

	No VEs in excess of 10% opacity as a six-minute average in a 60 minute observation period	N	3745-31-05 PTI 07-385	N	N	Y	Y	N	Y	Y	Y	Y	Y	N	St - all M,R,Rp requirements have been carried over from the PTI and additional gap filling terms have been added
	NA	N	40 CFR 52.21	N	N	N	N	N	N	N	N	N	N	N	BACT for NOx and CO has been determined to be no control.
	All new Nox and CO sources shall minimize emissions by use of best available control technology and operating practices	OAC rule 3745-21-08(B) and OAC rule 3745-21-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp ET - The design of the emissions unit and technology associated with current operating practices will satisfy the "best available control technologies and operating practices" required pursuant to OAC rule 3745-23-06/21-08.
	See comments section	OAC rule 3745-18-06(E)	N	N	N	N	N	N	N	N	N	N	N	N	The SO2 emissions limitation specified by this rule is less stringent than the SO2 limitations established pursuant to OAC rule 3745-31-05(A)(3).

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

C Instructions for Part III:

- C 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.

- C 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.