

## Statement of Basis For Title V Permit

Company Name	GE Willoughby Quartz	
Premise Number	02 43 16 0086	
What makes this facility a Title V facility?	Major source threshold emissions of Oxides of Nitrogen	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	In process	
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	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.	25-03		identifies how permittee should address requirements of emergency action plan
A.2.	20		identifies how demolition of asbestos requirements
A.3., 4., 5.,	31- 05(A)(3 ) and (D)		restricts NOX emissions from all non-trivial sources to below PSD major source threshold; requires record keeping to show compliance through calculations; requires reporting of any non-compliance.
B.1	77		list of all insignificant Nox emitting emissions units at the 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												
B003 B007	4.2 lb SO2 /mmBtu	18-12 (C)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use compliant fuel M - Tracking of fuel shipment sulfur content and heat value allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - Fuel sampling/analysis is compliance method by rule
B003 B007	0.23 lb PE /mmBtu	17-10 (C)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	for No. 6 oil M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit, between actual emissions tests. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible.
B003 B007	0.02 lb PE /mmBtu	17-10 (B)(1)		N	N	N	N	N	Y	N	Y	N	N	N	for No. 2 oil M - None - No. 2 oil is a presumed 'inherently clean fuel' - see also ET below ET - None - No. 2 oil normally used only for start-up
B003 B007 P021 P022 P023 P025 P026 P028	20 % opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	Y	N	M - Stack visible emissions checks serve to indicate ongoing compliance with limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified.
K020	202 lb VOC /day	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Coating/solvent tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination

K020	See comments	31-05		N	Y	Y	N	N	Y	N	Y	N	N	N	M - Direct tracking of coating volume usage. OR - 416 gallons/month of primer coat and 520 gallons/month of top coat.
K003 K004 K005 K006 K007 K008 K010 K011 K012 K013 K014 K015 K019	255 tons VOC /yr		40 CFR 52.1870 (c) (84)	N	N	Y	N	N	Y	N	Y	N	N	N	M - Coating/solvent tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
K020	None	21-09 (U)		Y	N	N	N	N	N	N	N	N	N	N	Permittee operating under 21-09(U)(2)(f) exemption
K003 K004 K005 K006 K007 K008 K010 K011 K012 K013 K014 K015 K019 R010	None	17-11 (B)  17-07 (A)  21-09 (U)		Y	N	N	N	N	N	N	N	N	N	N	17-11 Figure II n/a UMRE <10 lb/hr 17-11 Table I n/a Auglaize County  17-07 n/a by ruleif 17-11 is not applicable  Permittee received variance from 21-09.
K021	12.84 lb VOC /day 1.43 ton/yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Coating/solvent tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
K021 K023 K028 K031 P001	3.5 lb VOC /gal	21-09 (U)(1) (c)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Direct tracking of coating VOC content. ET - From formulation data or Method 24

K023	16.5 lb VOC /day	31-05		N	Y	Y	N	N	Y	N	Y	N	N	N	M - Coating/solvent tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. See also OR below. OR - 15 gal/day of coating ET - None - Mass balance from MR&R used as compliance determination
K029 K030 R010	<10 gal coating /day	21-09 (U)(2) (e)		N	Y	Y	N	N	Y	N	Y	N	N	N	M - Direct tracking of coating volume usage. ET - None - Requirement related directly to coating usage, not emissions.
K031	81.6 lb VOC /day 5.21 ton/yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Coating/solvent tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination
(All K--- EU's) P066	None	17-11 (B) 17-07 (A)		Y	N	N	N	N	N	N	N	N	N	N	17-11 Figure II n/a UMRE <10 lb/hr 17-11 Table I n/a Auglaize County  17-07 n/a by ruleif 17-11 is not applicable
P005 P006 P017 P083	17.3 lb PE /hr (combined)	17-11 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P017	0.07 lb PE /hr, 0.32 tons /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P017	1.66 lb OC /hr, 7.27 tons /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P005 P006 P017 P080 P083	20 % opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PM control, and therefore indication of ongoing compliance with the opacity limit. Daily was chosen as a reasonable and practical monitoring frequency. COMS not economically justified. ET - None normally required for opacity alone.

P005 P006 P017 P083	None	21-07 (G)		Y	N	N	N	N	N	N	N	N	N	N	21-07(G) n/a Auglaize County, not a "new source." - for P005, P006, P083  P017 - n/a per Ohio Supreme Court, Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.
P021 P022 P023 P025 P026 P028	12.4 lb PE /hr (combined)	17-11 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P034	4.36 lb PE /hr	17-11 31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P066  P080	0.48 lb PE /hr  0.24 lb PE /hr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16

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.