

# Statement of Basis For Title V Permit

Company Name	Griffin Wheel Company	
Premise Number	01 25 10 0987	
Number of Non-insignificant Emissions Units	29	
What makes this facility a Title V facility?	Particulate emissions exceed 100 tons/yr.	
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	
A.1	N	Y	The phenol emission limitation is based on the maximum hourly solid resin usage rate with an annual limitation of 8.5 tons established in PTI 01-08346 for synthetic minor purposes to avoid the foundry MACT Subpart EEEEE. Clarifier added that facility-wide single and combined HAP emissions at Griffin Wheel are less than 10 TPY and 25 TPY, respectively.
B001: A.I.2.a, A.I.2.b	Y	N	Under OAC rule 3745-17-11(B)(1), UCME is less than 10 lbs/hr, therefore, PWR equal 0.
F001: A.I.1, A.III.1, A.IV.1	Y	N	17-07(A) - limited to 20% as 6-minute average with MRR.
F005: A.I.1, A.I.2.a, A.II.1, A.III.1	N	Y	Visible PE limitation and BAT control measure established in PTI 01-08242 with MRR for both paved and unpaved roadways.
F006: A.I.1, A.I.2.a, A.II.1, A.III.1	N	Y	Visible PE limitation and BAT control measures established in PTI 01-08357 with MRR for both slag handling and storage piles.
F007: A.I.1, A.I.2.a, A.II.1, A.III.1	N	Y	Visible PE limitations and BAT control measures established in PTI 01-08367 with annual allowable based on the maximum PTE at 42.7 tons metal charged at 70% control for enclosure.
F007: A.I.1	Y	N	17-07(B)(3) - Visible PE from the melt shop roof monitor shall not exceed 20% opacity, as a 6-minute average.
P002, P003: A.I.1	N	Y	PE limit established at 0.01 gr/dscf from baghouse stack in PTI 01-333.
P004, P004, P006: A.I.1, A.I.2.a	N	Y	PE limit established at 0.55 lb/hr with enclosure to eliminate fugitive VE in PTI 01-6399.
P007, P008, P009: A.I.1	N	Y	PE limit established at 0.01 gr/dscf from baghouse stack in PTI 01-333.

P010, P011: A.I.1	N	Y	PE limit established at 2.6 lbs/hr with visible stack PE limited to 10% opacity in PTI 01-08678.
P012, P013, P015, P016, P017, P018: A.I.1	N	Y	PE limit established at 0.01 gr/dscf from baghouse stack in PTI 01-333.
P019: A.I.1	N	Y	PE limit established at 1.0 lb/hr in PTI 01-1742.
P020: A.I.1	N	Y	The OC emission limitation is based on the maximum hourly PWR rate with an annual limitation of 1.49 tons established in PTI 01-08340 for synthetic minor purposes to avoid the foundry MACT Subpart EEEEE.
P021: A.I.1	N	Y	PE, NOX, OC and SO2 limits established at PTE in PTI 01-08239.
P021: A.I.1	N	Y	PE limit established at 0.77 lb/hr in PTI 01-08240.
P901, P902, P903, A.I.1	N	Y	PE limits established at 0.01gr/dscf from baghouse stack and NOX, OC, CO, Pb and SO2 limits established in PTI 01-08239 using emission data and SCC factors.
P901, P902, P903, A.I.1	Y	N	17-07(B)(3) - Visible PE from the melt shop roof monitor shall not exceed 20% opacity, as a 6-minute average.
P903, A.I.1	N	Y	Hooding and capture efficiency to eliminate VE at the point of capture established in PTI 01-7377.

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.

C 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		ND	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Othe r												
B001	0.02 lb PE/MMbtu of heat input	17-07(A) 18-06(E) 17-11(B)	n n n	y y y	n n n	ND: UCME is less than 10 lbs/hr due to natural gas combustion.									
F001	20% opacity as a 6-minute average.	17-07(A)	n	n	n	y	n	n	y	n	y	n	n	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance.
F005	VE shall not exceed 1 minute from paved.  VE shall not exceed 3 minute from unpaved.	31-05(A)(3) (PTI # 01-08242)	n n	n n	n n	y y	n n	n n	y y	n n	y y	n n	n n	n n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance.
F006	VE shall not exceed 3 minute from slag handling or storage piles.	31-05(A)(3) (PTI # 01-08357)	n	n	n	y	n	n	y	n	y	n	n	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance.
F007	VE shall not exceed 20% as 6 minute average.	17-07(B)(3)	n	n	n	y	n	n	y	n	y	n	n	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance.

P001	PE shall not exceed 0.77 lb/hr & 3.4 ton/yr  15.86 lbs OC/hr and 8.5 tons OC/yr	17-07(A)  31-05(A)(3)  (PTI # 01-08346)	n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirements are not necessary to demonstrate compliance. R: Record keeping requirement are not necessary to show compliance. Rp: Reporting requirements are not necessary to show compliance.  OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirements are necessary to show compliance. Rp: Reporting requirements are necessary to show compliance. ET: Emission testing is not necessary to show compliance.
P002, P003, P004, P005, P006, P007, P008, P009, P012, P013, P015, P016, P017, P018,	Outlet from baghouse shall not exceed 0.01 gr/dscf of airflow.	31-05(A)(3)  (PTI # 01-333)	n	n	y	y	n	n	n	n	n	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Emission testing is required to show compliance using USEPA approved methods.
P004, P005, P006	0.55 lb PE/hr & 2.4 ton PE/yr	31-05(A)(3)  (PTI # 01-6399)	n	n	y	y	n	n	n	n	n	n	y	n	OR- Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirements is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Emission testing is required to show compliance using USEPA methods..

P010, P011	2.6 lbs PE/hr & 11.5 tons PE/yr.	31- 05(A)(3)  (PTI # 01- 08678)	n	n	y	y	n	n	y	n	n	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: If required, compliance will be demonstrated using USEPA test methods.
P019	1 lb PE/hr and 4.3 tons PE/yr	31- 05(A)(3)  (PTI # 01-1742)	n	n	y	y	n	n	y	n	n	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Compliance will be demonstrated using USEPA approved test method.
P020	0.99 lb PE/hr and 4.3 tons PE/yr  0.34 lb OC/hr and 1.49 tons OC/yr	31- 05(A)(3)  (PTI # 01- 08340)	n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirements are not necessary to show compliance.  M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirements are not necessary to show compliance.

P021	4.2 lbs PE/hr and 18.4 tons PE/yr	31- 05(A)(3)  (PTI # 01- 08239)	n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirement is not necessary to show compliance. ET: Emission testing is not required to demonstrate compliance with this limitation.
	0.4 lb NOx/hr and 1.8 tons NOx/yr		n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirement is not necessary to show compliance. ET: Emission testing is not required to demonstrate compliance with this limitation.
	0.6 lb VOC/hr and 2.6 tons VOC/yr		n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirement is not necessary to show compliance. ET: Emission testing is not required to demonstrate compliance with this limitation.
	0.8 lb SO2/hr and 3.7 tons SO2/yr		n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirement is not necessary to show compliance. ET: Emission testing is not required to demonstrate compliance with this limitation.
P022	0.77 lb PE/hr and 3.4 tons PE/yr	31- 05(A)(3)  (PTI # 01- 08240)	n	n	y	y	n	n	y	n	y	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Compliance will be demonstrated using USEPA approved test method.

F001, P001, P002, P003, P004, P005, P006, P007, P008, P009, P012, P013, P015, P016, P017, P018, P019, P021, P022, P901, P902, P903	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average.	17-07(A)(1)	n	n	n	y	n	n	y	n	y	n	y	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: If required, compliance will be demonstrated using USEPA method 9.
P010, P011	Visible PE from fabric filter stack shall not exceed 10% opacity as a 6-minute average.	31-05(A)(3)  (PTI # 01-08240)	n	n	n	y	n	n	y	n	y	n	y	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: If required, compliance will be demonstrated using USEPA method 9.
P901, P902, P903	No visible PE from baghouse stack.	31-05(A)(3)  PTI #01-7377)	n	n	n	y	n	n	y	n	y	n	y	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: If required, compliance will be demonstrated using USEPA method 9.

F006, P901, P902	Visible PE from EAF roof monitor shall not exceed 20% opacity as a 6-minute average.	17-07(B)	n	n	n	y	n	n	y	n	y	n	y	n	M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: If required, compliance will be demonstrated using USEPA method 9.
P012, P013, P015, P016,	50 lbs PE/hr	17-11(A)(1) Figure II	n	n	n	n	n	n	n	n	n	n	y	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirements is not necessary to show compliance. ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
P002, P003,	5.2 lbs PE/hr	17-11(A)(1) Figure II	n	n	n	n	n	n	n	n	n	n	y	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirements is not necessary to show compliance. ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
P007, P008, P009	10.56 lbs PE/hr	17-11(A)(1) Figure II	n	n	n	n	n	n	n	n	n	n	y	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirements is not necessary to show compliance. ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
B001	0.020 lb PE/MMBTU of heat input	17-10(B)(1)	n	n	n	n	n	n	n	n	n	n	n	n	M: Monitoring requirement is not necessary to show compliance. R: Record keeping requirement is not necessary to show compliance. Rp: Reporting requirement is not necessary to show compliance. ET: Emission testing is not required to demonstrate compliance with this limitation.

P901, P902	8.7 lbs PM10/hr & 38 tons PM10/yr	31- 05(A)(3)  (PTI# 01-7377)	n	n	y	y	n	n	y	n	y	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Compliance will be demonstrated using USEPA approved test method.	
	1.4 lbs OC/hr & 6.1 tons OC/yr		n	n	n	n	n	n	n	n	n	n	y	n	ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.	
	2.9 lbs Nox/hr & 12.8 tons Nox/yr		n	n	n	n	n	n	n	n	n	n	n	y	n	ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
	59.5 lbs CO/hr & 261 tons CO/yr		n	n	n	n	n	n	n	n	n	n	n	y	n	ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
	1.4 lbs SOx/hr & 6.1 tons Sox/yr		n	n	n	n	n	n	n	n	n	n	n	y	n	ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.
	0.05 lbs Pb/hr & 0.21 tons Pb/yr		n	n	n	n	n	n	n	n	n	n	n	y	n	ET: Emission testing is required to demonstrate compliance using USEPA approved test methods.

P903	1.9 lbs PM10/hr & 8.5 tons PM10/yr	31-05(A)(3) PTI 01-6338	n	n	y	n	n	n	n	n	n	n	y	n	OR: Operational restriction is necessary to show compliance. M: Monitoring requirement is necessary to show compliance. R: Record keeping requirement is necessary to show compliance. Rp: Reporting requirement is necessary to show compliance. ET: Compliance will be demonstrated using USEPA approved test method.
	5.9 lbs Nox/hr & 25.6 tons Nox/yr		n	n	n	n	n	n	n	n	n	n	y	n	ET: Compliance will be demonstrated using USEPA approved test method.
	19.5 lbs CO/hr & 85 tons CO/yr		n	n	n	n	n	n	n	n	n	n	y	n	ET: Compliance will be demonstrated using USEPA approved test method.
	2.7 lbs Sox/hr & 12 tons Sox/yr		n	n	n	n	n	n	n	n	n	n	y	n	ET: Compliance will be demonstrated using USEPA approved test method.
	No visible fugitive PE during refining.		n	n	n	n	n	n	n	n	n	n	y	n	ET: If required, compliance will be demonstrated using USEPA approved test method.

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.

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.

- C 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.