

## Statement of Basis For Title V Permit

Company Name	J&L Specialty Steels, Inc.	
Premise Number	15-76-00-0378	
Number of Non-insignificant Emissions Units	18	
What makes this facility a Title V facility?	Potential to emit over 100 tons/year Nox and SO2	
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	
NA			

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B001 B002	20% Opacity 0.020 lb PM/MMBtu Boiler Input 1.6 lbs SO2/MMBtu Boiler Input	17-07(A) 17- 10(B)(1) 18-06(D)	NA	Y	Y	Y	Y	Y	NA	
F002	No visible particulates RACM	17- 07(B)(4) 17- 08(B)(7), (B)(8),(B)( 9)	NA	N	Y	Y	N	Y	NA	OR - None required to demonstrate compliance Rp -Records available for inspection upon request
P006 P008 P010 P011 P012 P013 P017 P018 P024	No applicable limitation  No applicable limitation	17-11  17-07(A)	NA	Y	Y	Y	Y	Y	NA	
P004 P003 P019 P005	20% Opacity 4.70 lbs/hr PM 1.53 lbs/hr PM	17-07(A) 17-11 17-11	NA	N	Y	Y	Y	Y	NA	OR- None required to demonstrate compliance
P025	4.09 lbs/hr PM 20% Opacity	17-11 17-07(A)	NA	Y	Y	Y	Y	Y	NA	
P009	20.12 lbs/hr PM 20% Opacity	17-11 17-07(A)	NA	Y	Y	Y	Y	Y	NA	

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 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.

- **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 each column where “N” is specified, there should be a brief explanation in the “Comments” section. 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.

- 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.

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