

Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	LAFARGE / Systech	
Premise Number	03-63-00-0002	
Number of Non-insignificant Emissions Units	0	
What makes this facility a Title V facility?	Lafarge and Systech together are a single Title V facility - they are a PSD major source for PM, SO2, NOx, CO, and HAPs	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
see comments		40 CFR 60.340 et seq. Subpart FF	Lafarge and Systech have requested separate Title V permits. Systech receives and blends waste-derived fuel which is supplied to the Lafarge cement kilns. This Title V permit is for Lafarge's cement production and associated operations. It should be noted that Lafarge and Systech are also subject to the extensive BIF requirements (40 CFR 266 Subpart H). Currently, Ohio EPA is not delegated authority for BIF. It should be further noted that there is a MACT proposal (40 CFR 63 Subpart EEE) which is expected to essentially reissue the BIF requirements under Clean Air Act authority, but this has not been finalized yet.
daily recordkeeping requirement		NSPS	A general production tracking requirement, from 40 CFR 60.63(a), NSPS Subpart F

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		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F001 F002 F003 P001 P002 P003 P004 P005 P006 P007 P008 P009 P013	none	17-08 17-07 17-11 17-07								<p>This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Paulding County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.</p> <p>This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).</p> <p>The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. 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 I of OAC rule 3745-17-11 does not apply since the facility is located in Paulding County, which is identified as a P-2 County.</p> <p>This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) 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.</p>
P010 P011	51.6 lb/hr PE (P010 & P011 combined)	17-11 (B)(2)		Y	Y	Y	N	Y	N	<p>OR - A general operation and maintenance requirement, for the cyclonic mechanical particulate control equipment. M, R, Rp - No applicable requirements for a cyclone.</p>
P014 P015	75 lb/hr PE 75 lb/hr PE	17-11 (A)		Y	Y	Y	Y	Y	N	<p>OR - Pressure drop operational range across the baghouse required.</p>

P010 P011 P014 P015	20% opacity	17-07 (A) (1-3)		Y	Y	Y	Y	N	N	ET- None required.
P014 P015	43 lb SO2 per ton cement	18-69 (B)		N	Y	Y	Y	Y	N	
P014 P015	Specifications of blended waste-derived fuel	31-05		N	N	N	N	N	N	
P025 P026	exempt		40CF R261	N	N	N	N	N	N	
P025 P026	0.083 lbs PE/hr 0.01 gr/dscf 0% opacity		31-05	Y	Y	Y	Y	N	N	OR - Pressure drop operational range across the baghouse required. ET- none required.
P901	10% opacity		40CF R60.6 2(c)	N	N	N	N	Y	N	10% opacity from storage piles and conveyor transfer points, from 40 CFR 60.63(a), NSPS Subpart F M, R, Rp - None included in NSPS

P901	<p>4.7 lbs PE/day-fugitive</p> <p>0.005 gr/dscf or no VEs from the process baghouse</p> <p>VEs not to exceed 1 minute, from the storage hall egress points</p>		31-05		Y	Y	Y	Y	N	N	<p>OR - Pressure drop operational range across the baghouse required.</p> <p>ET- none required.</p>
P902	none	none								<p>This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Paulding County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.</p> <p>This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).</p> <p>The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. 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 I of OAC rule 3745-17-11 does not apply since the facility is located in Paulding County, which is identified as a P-2 County.</p> <p>This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) 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.</p>	

P903	0.077 lb PE/hr, from silo		31-05									OR - Pressure drop operational range across the baghouse required. ET- none required.
	0% opacity, from baghouse and conveyor transfer points			Y	Y	Y	Y	N	N			

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