

Statement of Basis For Title V Permit

Prepared May 22, 2003

Company Name	Pilkington North America, Inc.	
Premise Number	0487010012	
What makes this facility a Title V facility?	Emissions > 100 TPY of PM, SO ₂ and NO _x	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y	
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.	N	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

? **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												
F003, F004, F005, F006, F007	None	17-08 (A)(1)		Y	N	N	N	N	N	N	N	N	N	N	ND - This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore OAC rule 3745-17-08 does not apply to these fugitive emissions units.
	20% opacity	17-07- (A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PE control, therefore indication of ongoing compliance with the opacity limit.
F003	9.09 lbs/hr PE	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PE control, aslo with appropriate M, R, & RP ET - If required, testing will be performed. Stack testing was performed on the worst-case scenario baghouses on April 20, 22 and June 15, 2001, to develop emission factors for all of the baghouses and to demonstrate compliance.

F004	23.43 lbs/hr PE	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PE control, aslo with appropriate M, R, & RP ET - If required, testing will be performed. Stack testing was performed on the worst-case scenario baghouses on April 20, 22 and June 15, 2001, to develop emission factors for all of the baghouses and to demonstrate compliance.
F005	10.50 lbs/hr PE	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PE control, aslo with appropriate M, R, & RP ET - If required, testing will be performed. Stack testing was performed on the worst-case scenario baghouses on April 20, 22 and June 15, 2001, to develop emission factors for all of the baghouses and to demonstrate compliance.
F006	27.07 lbs/hr PE	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse operational parameter monitoring (pressure drop) provides indication of ongoing effective PE control, aslo with appropriate M, R, & RP ET - If required, testing will be performed. Stack testing was performed on the worst-case scenario baghouses on April 20, 22 and June 15, 2001, to develop emission factors for all of the baghouses and to demonstrate compliance.

F007	39.81 lbs/hr PE	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - the permittee shall operate the cyclones whenever the batch and a cullet feed system is in operation. Aslo has appropriate M, R, & RP</p> <p>ET - If required, testing will be performed. Stack testing was performed on the worst-case scenario cyclone on April 20, 2001, to develop emission factors for all the cyclones and to demonstrate compliance.</p>
P001	83.27 lbs/hr NOx; 364.7 TPY NOx 149.6 TPY PE 243.8 TPY SO2 25.64 lbs/hr sulfuric acid mist and 112.34 TPY H2SO4 3.88 lbs/hr CO and 16.99 TPY 2.45 lbs/hr VOC and 10.75 TPY VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>BASIS - Netting limitation established in PTI 04-1076, issued 3/25/98 for NOx, SO2, PE, H2SO4</p> <p>OR - Maximum salt cake and/or gypsum employed shall not exceed 13 lb of salt cake/1000 lb sand employed. CAM is not applicable. Also, burning only natural gas and/or fuel oil in this emissions unit.</p> <p>All the TPY limits are based on a rolling 12-month summation of monthly emissions. A rolling 12-month restriction of the production rate will vary based on the following formula: $PR = E: *(1/EF) * 2000$ lbs/ton where PR = production rate (tons of glass draw per rolling 12-month period) EL = the emission limit of one of the following: 364.7 TPY NOx, 243.8 TPY of SO2, or 149.6 TPY PE EF= the emission factor determined from the most recent stack test for either NOx, SO2, or PE. The new allowable production limit shall be the lowest production rate resulting from the above formula. The TPY limits for NOx, SO2, PE were based on netting limitations established in PTI 04-1076 issued March 25, 1998, modified on June 4, 2002.</p> <p>R - Recordkeeping of the tons of glass drawn per year along with the rolling, 12-month summation of NOx, SO2, PE, H2SO4, CO and VOC.</p> <p>Rp - Quarterly deviation reports of rolling 12-month emission limitations.</p> <p>ET - the permittee stack tested in February 2003 for NOx, PE, SO2</p>

P001	13 lbs salt cake /1000 lbs sand	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR, M, R & RP- Maximum salt cake and/or gypsum usage shall not exceed 13 lbs salt cake per 1000 lbs of sand with appropriate monitoring, recordkeeping, and reporting. ET - Compliance is through recordkeeping in section A.III.
P001	20% opacity as a 6-minute average	17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas and/or number 2 fuel oil.
P001	38.91 lb/hr PE	17-11 (B)(1)		N	N	Y	N	N	Y	N	Y	N	Y	N	M & R - Daily recording of the tons of glass produced, hrs of operation, production rate of glass and the hourly PE emission rate. Rp - Quarterly deviation reports of emission rate exceedences. ET - Compliance will be demonstrated through record keeping and emission test using Method 5 of 40 CFR part 60, Appendix A.
P001	55.67 lb/hr SO ₂	18-06(E)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	M & R - record keeping is required of the tons of glass draw produced, and hours of operation. Rp - Quarterly deviation reports of emission rate exceedences. ET - OAC rule 3745-18-04, ; Method 6 of 40 CFR Part 60, Appendix A.
P003	220 lbs/hr NOx 100 lbs/hr SO2 4.5 lbs/hr VOC and 20 TPY VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - see the OR comment for the PE, SO2 and NOx TPY limits below. M & R - Monthly recording of the tons of glass produced, hrs of operation, and rolling 12-month summation of NOx, SO2, and PE. Rp - Quarterly deviation reports of rolling 12-month summation of NOx, SO2, and PE. ET - Compliance will be demonstrated through record keeping and emission test using Method 6, 7 and 25 of 40 CFR Part 60, Appendix A.

P003	4.5 lbs/hr CO and 20 TPY CO 1.5 lbs/hr H2SO4 and 6.5 TPY	31-05 (A)(3)		N	Y	Y for H2 SO 4	N	N	Y	N	Y	N	Y	N	NOTE: The company currently does not meet these limits based on stack testing conducted on December 4, 2001. The facility submitted a PSD permit-to-install to adjust the limits and to bring the facility into compliance. The Toledo Division of Environmental Services is processing the PTI application at this time (4/30/03). Refer to the compliance schedule in section A.VI. of this source permit for the schedule. OR for H2SO4 - Maximum salt cake and/or gypsum usage shall not exceed the rate determined during the most recent stack test that demonstrated compliance. ET - Compliance will be demonstrated through record keeping and emission test using Method 10 and 8 of 40 CFR Part 60, Appendix A.
P003	144 TPY PE 945 TPY NOx 272 TPY SO2	31-05 (D)		N	Y	Y	N	N	Y	N	Y	N	Y	N	NOTE: all of the TPY limits are based on a rolling 12-month summation of monthly emissions OR - a rolling 12-month restriction of the production rate will vary based on the following formula: $PR = E: *(1/EF) * 2000$ lbs/ton where PR = production rate (tons of glass draw per rolling 12-month period) EL = the emission limit of one of the following: 945 TPY NOx, 272 TPY of SO2, or 144 TPY PE EF= the emission factor determined from the most recent stack test for either NOx, SO2, or PE. The new allowable production limit shall be the lowest production rate resulting from the above formula. The TPY limits for NOx, SO2, PE were determined so that a PSD review would not be triggered
P003	36.7 % opacity	17-07 (C)		N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - the facility was granted an equivalent visible particulate emission limitation based on stack testing performed Dec. 4, 2001. M, R, & Rp - daily checks for visible emissions and logging the results along with quarterly deviation reporting.

P003	41 lbs/hr PE	17-11		N	N	Y	N	N	Y	N	Y	N	Y	N	M & R - Daily recording of the tons of glass produced, hrs of operation, production rate of glass. Rp - Quarterly deviation reports of emission rate exceedences. ET - Compliance will be demonstrated through record keeping and emission testing using Method 5 of 40 CFR part 60, Appendix A.
P003	none	18-06 (E)(2)		N	N	N	N	N	N	N	N	N	N	N	Basis - the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P003	none	21-07 (B) 21-08(B) 23-06(B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
P011	9.1 lb/hr and 8.7 TPY NOx 2.8 lb/hr and 2.7 TPY CO 0.9 lb/hr and 0.9 TPY PM 0.9 lb/hr and 0.8 TPY SO2 1.0 lb/hr and 1.0 TPY VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - the permittee shall burn only commercially available diesel fuel in this emissions unit and the annual fuel usage shall not exceed 40,000 gallons per year based on the rolling, 12-months fuel usage. M, R & Rp - appropriate M&R for fuel usage each month. Also, once a year, check the timing retard so that's retarded 4 degrees from peak power settings. ET - compliance is through record keeping and using AP-42 emission factors (Section 3.3, Table 3.3-1) to determine lb/hr and TPY emissions.
	20% opacity as a 6 minute average	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - the permittee shall burn only commercially available diesel fuel in this emissions unit. ET - none, unless requested to perform method 9.

	none	17-11 (B)(5) and 18-06 (G)		N	N	N	N	N	N	N	N	N	N	N	Basis - this rule is less stringent than the BAT determination that resulted in the emission limitation.
	none	21-07 (B) 21- 08(B) 23-06 (B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
P012 and P013	10.0 lb/hr NOx 3.1 lb/hr CO 1.0 lb/hr PM 0.9 lb/hr SO2 1.1 lb/hr VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - Sources P012, P013 and P014 (Group 1) have a fuel limitation of 18,000 gallons per year as a group and the following TPY limits: NOX = 3.9 TPY; CO = 1.2 TPY; PM = 0.4 TPY; SO2 = 0.4 TPY and VOC = 0.4 TPY.</p> <p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit and the annual combined fuel usage shall not exceed 18,000 gallons per year based on the rolling, 12-months fuel usage.</p> <p>M, R & Rp - appropriate M&R for fuel usage each month. Also, once a year, check the timing retard so that's retarded 4 degrees from peak power settings.</p> <p>ET - compliance is through record keeping and using AP-42 emission factors ("Stationary Internal Combustion Sources", section 3.3, table 3.3-1, dated 10/96) to determine lb/hr and TPY emissions.</p>
	20% opacity as a 6 minute average	17-07 (A)(1)		N	Y	N	N	N	Y	N	Y	N	Y	N	<p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit.</p> <p>M - no monitoring is necessary if only diesel fuel is burned.</p> <p>ET - none, unless requested to perform method 9.</p>

	none	17-11 (B)(5) and 18-06 (G)		N	N	N	N	N	N	N	N	N	N	N	Basis - this rule is less stringent than the BAT determination that resulted in the emission limitation.
	none	21-07 (B) 21- 08(B) 23-06 (B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
P014	19.3 lb/hr NOx 5.9 lb/hr CO 1.9 lb/hr PM 1.8 lb/hr SO2 2.2 lb/hr VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - Sources P012, P013 and P014 (Group 1) have a fuel limitation of 18,000 gallons per year as a group and the following TPY limits: NOX = 3.9 TPY; CO = 1.2 TPY; PM = 0.4 TPY; SO2 = 0.4 TPY and VOC = 0.4 TPY.</p> <p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit and the annual combined fuel usage shall not exceed 18,000 gallons per year based on the rolling, 12-months fuel usage.</p> <p>M, R & Rp - appropriate M&R for fuel usage each month. Also, once a year, check the timing retard so that's retarded 4 degrees from peak power settings.</p> <p>ET - compliance is through record keeping and using AP-42 emission factors ("Stationary Internal Combustion Sources", section 3.3, table 3.3-1, dated 10/96) to determine lb/hr and TPY emissions.</p>
	20% opacity as a 6 minute average	17-07 (A)(1)		N	Y	N	N	N	Y	N	Y	N	Y	N	<p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit.</p> <p>M - no monitoring is necessary if only diesel fuel is burned.</p> <p>ET - none, unless requested to perform method 9.</p>

	none	17-11 (B)(5) and 18-06 (G)		N	N	N	N	N	N	N	N	N	N	N	Basis - this rule is less stringent than the BAT determination that resulted in the emission limitation.
	none	21-07 (B) 21- 08(B) 23-06 (B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
P015, P016 and P017	5.1 lb/hr NOx 1.6 lb/hr CO 0.5 lb/hr PM 0.5 lb/hr SO2 0.6 lb/hr VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - Sources P015, P016 and P017 (Group 2) have a fuel limitation of 18,000 gallons per year as a group and the following TPY limits: NOX = 3.9 TPY; CO = 1.2 TPY; PM = 0.4 TPY; SO2 = 0.4 TPY and VOC = 0.4 TPY.</p> <p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit and the annual combined fuel usage shall not exceed 18,000 gallons per year based on the rolling, 12-months fuel usage.</p> <p>M, R & Rp - appropriate M&R for fuel usage each month. Also, once a year, check the timing retard so that's retarded 4 degrees from peak power settings.</p> <p>ET - compliance is through record keeping and using AP-42 emission factors ("Stationary Internal Combustion Sources", section 3.3, table 3.3-1, dated 10/96) to determine lb/hr and TPY emissions.</p>
	20% opacity as a 6 minute average	17-07 (A)(1)		N	Y	N	N	N	Y	N	Y	N	Y	N	<p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit.</p> <p>M - no monitoring is necessary if only diesel fuel is burned.</p> <p>ET - none, unless requested to perform method 9.</p>

	none	17-11 (B)(5) and 18-06 (G)		N	N	N	N	N	N	N	N	N	N	N	Basis - this rule is less stringent than the BAT determination that resulted in the emission limitation.
	none	21-07 (B) 21- 08(B) 23-06 (B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
P018, P019, and P020	6.2 lb/hr NOx 1.9 lb/hr CO 0.6 lb/hr PM 0.6 lb/hr SO2 0.7 lb/hr VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - Sources P018, P019 and P020 (Group 3) have a fuel limitation of 18,000 gallons per year as a group and the following TPY limits: NOX = 3.9 TPY; CO = 1.2 TPY; PM = 0.4 TPY; SO2 = 0.4 TPY and VOC = 0.4 TPY.</p> <p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit and the annual combined fuel usage shall not exceed 18,000 gallons per year based on the rolling, 12-months fuel usage.</p> <p>M, R & Rp - appropriate M&R for fuel usage each month. Also, once a year, check the timing retard so that's retarded 4 degrees from peak power settings.</p> <p>ET - compliance is through record keeping and using AP-42 emission factors ("Stationary Internal Combustion Sources", section 3.3, table 3.3-1, dated 10/96) to determine lb/hr and TPY emissions.</p>
	20% opacity as a 6 minute average	17-07 (A)(1)		N	Y	N	N	N	Y	N	Y	N	Y	N	<p>OR - the permittee shall burn only commercially available diesel fuel in this emissions unit.</p> <p>M - no monitoring is necessary if only diesel fuel is burned.</p> <p>ET - none, unless requested to perform method 9.</p>

	none	17-11 (B)(5) and 18-06 (G)		N	N	N	N	N	N	N	N	N	N	N	Basis - this rule is less stringent than the BAT determination that resulted in the emission limitation.
	none	21-07 (B) 21- 08(B) 23-06 (B)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant to the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
R001, R002 and R003	none	31-05 (A)(3)		N	N	N	N	N	N	N	N	N	N	N	Basis - the permittee satisfied the BAT and operating practices required pursuant the the three stated OAC rules by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).
R001, R002 and R003	8 lbs/hr OC; 40 lbs/day OC	21-07 (G)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - This unit is subject to OAC rule 3745-21-07(G)(2) on any day when any photochemically reactive material is employed (coating or cleanup). M&R - recordkeeping of photochemically reactive materials employed and OC content. ET - compliance is based on recordkeeping requirements of section A.III.of permit.

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