

Statement of Basis For Title V Permit

Company Name	Lorain Tubular Company, LLC	
Premise Number	02-47-08-0961	
Number of Non-insignificant Emissions Units	13	
What makes this facility a Title V facility?	PM-10, Sulfur dioxide, Nitrogen oxides, Carbon monoxide, Volatile organic compound	
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	
A.1.	25	N	This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #49, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

- **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.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F001	10% opacity as a 3-minute average	17-07 (B)(8)(a)		Y	Y	Y	Y	Y		OR: The following restriction applies when using dust suppressant as fugitive dust control on unpaved roadways: a. Fugitive dust suppressants shall be certified with the PCB limitations set forth in 40 CFR 76, and there are no listed hazardous waste; b. No used oil shall be applied as dust suppressant; c. Dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the ORC, section 6111.
F001	employment of RACM	17-08 (B), (B)(8), (B)(9), (B)(2)		Y	Y	Y	Y	N		OR: The following restriction applies when using dust suppressant as fugitive dust control on unpaved roadways: a. Fugitive dust suppressants shall be certified with the PCB limitations set forth in 40 CFR 76, and there are no listed hazardous waste; b. No used oil shall be applied as dust suppressant; c. Dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the ORC, section 6111.
F003	employment of RACM	17-08 (B)		Y	Y	Y	Y	N		OR: The pressure of the water spray nozzle system for the reelers shall be maintained at a minimum of 15 psig at all times.
F003	20% opacity as a 3-minute average, except as provided by rule	17-07 (B)(1)		N	Y	Y	Y	Y		

K002, K003, K005, K006	3.75 lbs of VOC per gallon of coating, excluding water and exempt solvents	N	Y	Y	Y	Y	Y	N	Other: OAC rule 3745-31-05 (A)(3) OR: K002 - maximum annual usage not to exceed 105,600 gallons, based upon a rolling, 12-month summation of the coating usage figures. K003 - maximum annual usage not to exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. K005 - maximum annual usage not to exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage figures. K006 - maximum annual usage not to exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage figures.
P035, P036, P037, P038, P039	exempt	17-11		Y	Y	Y	Y	N	The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per 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 because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero. OR: Burn only natural gas as fuel
P035, P036, P037, P038, P039	exempt	17-07 (A)		Y	Y	Y	Y	N	This emissions unit is exempt from the visible particulate emission 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.
P035, P036, P037, P038, P039	1.98 lbs of SO2 per MMBtu of actual heat input	18-53 (E)(4)	Y	Y	Y	Y	Y	Y	OR: Burn only natural gas as fuel
P036, P037, P038, P040	0.15 lb of NOx per MMBtu	N	Y	Y	Y	Y	Y	Y	Other: Pursuant to paragraph 9 of the 'Supplemental Information/Additional Special Terms and Conditions' in PTI No. 02-7768, issued July 26, 1995, low NOx natural gas burners shall be installed and shall not exceed 0.15 lb of NOx per MMBtu and be operated to optimize the reduction of NOx. PTI No. 02-7768 was issued to 'Republic Technologies International, LLC' (formerly known as USS/Kobe Steel). OR: Burn only natural gas as fuel
P039	178 lbs of SO2 per hour	18-53 (E)(6)	Y	Y	Y	Y	Y	Y	OR: Burn only natural gas as fuel

P040	20% opacity as a 6-minute average, except as provided by rule	17-07 (A)		N	Y	Y	Y	Y		
P040	0.36 lb of PE per hour	N	Y	Y	Y	Y	Y	Y		Other: OAC rule 3745-31-05 (A)(3) PTI No. 02-4153 OR: Burn only natural gas as fuel
P040	0.03 of SO2 per hour	N	Y	Y	Y	Y	Y	Y		Other: OAC rule 3745-31-05 (A)(3) PTI No. 02-4153 OR: Burn only natural gas as fuel
P040	7.64 of NOx per hour	N	Y	Y	Y	Y	Y	Y		Other: OAC rule 3745-31-05 (A)(3) PTI No. 02-4153 OR: Burn only natural gas as fuel
P040	4.19 lbs of CO per hour	N	Y	Y	Y	Y	Y	Y		Other: OAC rule 3745-31-05 (A)(3) PTI No. 02-4153 OR: Burn only natural gas as fuel
P040	0.27 of VOC per hour	N	Y	Y	Y	Y	Y	Y		Other: OAC rule 3745-31-05 (A)(3) PTI No. 02-4153 OR: Burn only natural gas as fuel

P048	employment of RACM (see comment)	17-08		Y	Y	Y	Y	Y		<p>RACM: The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the use of localized hooding over the emissions unit, and venting of the particulate emissions to the cyclone separator and the venturi scrubber.</p> <p>The collection efficiency shall be sufficient to eliminate visible particulate emissions of fugitive dust from the building housing this emissions unit.</p> <p>All captured emissions from the No. 3 Seamless Mill Rotary Mill shall be routed to the cyclone separator, and all emissions from the cyclone separator shall be vented to the venturi scrubber.</p> <p>The control equipment employed shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.</p>
P048	13.4 lbs of PE per hour	17-11		Y	Y	Y	Y	Y		<p>OR: The pressure drop across the scrubber shall be continuously maintained at a value of not less than 34 inches of water at all times while the emissions unit is in operation.</p> <p>The scrubber water flow rate shall be continuously maintained at a value of not less than 590 gallons per minute at all times while the emissions unit is in operation.</p>

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 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 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 comments. 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.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- 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.