

Statement of Basis For Title V Permit

Version 2. -3/27/98

Company Name	National Electrical Carbon		
Premise Number	03-74-01-0109		
Number of Non-insignificant Emissions Units	35		
What makes this facility a Title V facility?	HAP (POM) emissions		
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	
n/a			

- **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							
B001 B005	0.020 lb PE /mmBtu, for gas and No. 2 Oil	17-10 (B)(2)		N	N	N	N	N	N	M, R, Rp - Compliance with the limit is based on AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
B005	1.6 lb SO2 /mmBtu, for No. 2 Oil	18-06 (C)		N	N	N	N	N	N	M, R, Rp - Compliance with the limit is based on AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
B001 B005 N002 P008 P011 P012 P013 P016 P018 P035 P037 P067 P076 P079 P126 P127 P128 P129 P130 Z006 Z010	20% opacity	17-07 (A)		N	Y	Y	Y	N	N	ET - None normally required for opacity.
P018	1.9 lb/hr PE	17-11 (B)(2)		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY

N002	0.1 lb PE / 100 lb waste charged	17-09 (B)		Y	Y	Y	Y	Y	N	None
P008 P011 P012 P013 P016 P035 P037 P067 P076 P079 P126 P127 P128 P129 P130 Z006 Z010	4.1 lb/hr PE 3.4 lb/hr PE 2.6 lb/hr PE* 2.6 lb/hr PE* 6.5 lb/hr PE 4.8 lb/hr PE 1.6 lb/hr PE 1.6 lb/hr PE 4.5 lb/hr PE 2.8 lb/hr PE 11.2 lb/hr PE 5.4 lb/hr PE 3.0 lb/hr PE 1.8 lb/hr PE 1.8 lb/hr PE 3.4 lb/hr PE 1.9 lb/hr PE	17-11 (B)(2)		Y	Y	Y	Y	N	N	OR - Pressure drop operational range across the baghouse required. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY * Limit is for P012 and P013 combined.
P051	1.4 lb/hr PE	17-11 (B)(2)		Y	Y	Y	Y	Y	N	OR - temperature parametric monitoring
P051 P059 P087 Z007	none	21-07		N	N	N	N	N	N	This facility is in Seneca County and therefore, not located in a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and not a "new source". Therefore, pursuant to OAC rule 3745-21-07(A) it is exempt from the requirements of OAC rule 3745-21-07.
P094 P101 P106 P119 P120 P121 P122 P123 P125	none	21-07								This emissions unit is not considered to use liquid organic materials, as defined in OAC rule 3745-21-01. Therefore, it is exempt from the requirements of OAC rule 3745-21-07(G).

P096	8 lbs OC per hr, 40 lbs OC per day	21-07 (G)(2)		N	N	Y	Y	Y	N	M - No monitoring requirements are necessary to show compliance.
N002	1.44 lb/hr PE	31-05		Y	Y	Y	Y	Y	N	None
N002	4.0 lb/hr Nox	31-05		N	N	N	N	N	N	M, R, Rp - Compliance with the limit is based on AP-42 emission factors; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
N002	5% opacity	31-05		N	Y	Y	Y	Y	N	ET - None normally required for opacity.
P094	0.1 lb VOC per hr avg	31-05		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P096	operational requirement	31-05		Y	N	N	N	N	N	OR - The permittee shall ensure that the refrigerated chiller is maintained in good working order and is operated at all times during operation of the emissions unit.
P096	operational requirement	31-05		Y	N	N	N	N	N	OR - The emissions unit shall be equipped with covers for closing off the entrance and exit when not in use and shall be operated and maintained in a manner which is consistent with good engineering practice and minimizes solvent evaporation from the unit.
P101	0.12 lb VOC per hr avg	31-05		N	Y	Y	Y	N	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P106	0.1 lb/hr PE, 0.31 ton/yr	31-05		Y	Y	Y	Y	Y	N	ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P106	4 lb/hrSO ₂ , 12.2 ton/yr	31-05		N	N	N	N	N	Y	Misc - The company must apply for and obtain a Permit to Install (PTI) modification to correct compliance issue.
P119 P120 P121 P122 P123	2.8 lb/hr CO 2.8 lb/hr CO 2.8 lb/hr CO 1.4 lb/hr CO 1.4 lb/hr CO	31-05		N	N	N	N	N	N	M, R, Rp - Compliance with the limit is based on the emissions unit Potential to Emit; therefore, it is not necessary to develop monitoring, record keeping and reporting requirements to ensure compliance with this limit. ET - None necessary - Engineering Guide 16 - actual emissions <25 TPY
P119 P120 P121 P122 P123	0.96 lb/hr PE 0.96 lb/hr PE 0.96 lb/hr PE 0.48 lb/hr PE 0.48 lb/hr PE	31-05		N	N	N	N	N	Y	Misc - Pollutant was incorrectly represented as particulate emissions instead of organic compounds. The company must obtain an administrative Permit to Install (PTI) modification to correct this issue.

P125	0.26 lb/hr OC 1.14 ton/yr	31-05		Y	Y	Y	Y	Y	N	OR - temperature parametric monitoring
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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 requirements. 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.