

Statement of Basis For Title V Permit

Company Name	Ohio Cast Products	
Premise Number	1576-05-0200	
Number of Non-insignificant Emissions Units	Twenty	
What makes this facility a Title V facility?	Potential emissions of greater than 100 tons per year of particulates , OCs and carbon monoxide.	
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	
NA			

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F001	RACM for fugitive dust 20% as a three minute average	17-08(B)(3) 17-07(B)(1)		N	Y	Y	Y	Y	Y	OR - None required Misc. - Compliance with Consent Order - typical for all E.U.
P001	5.77 lb PE/hr 20% stack opacity, 6 min. average RACM for fugitive dust emissions	17-11(A) 17-07(B) 17-08(B)		Y	Y	Y	Y	Y	Y	OR - Baghouse AP
P002	.01 gr PE?dscf, 1.16 lbs PE?hr. 20% opacity as a 6 minute average fugitive dust shall not exceed 20%, 3 min. RACM for fugitive dust emissions	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 17-11(A)		Y	Y	Y	Y	Y		OR - Baghouse AP ET - Stack Tests for PM and Opacity Misc. - Fugitive Dust Opacity
P003	14.94 lbs PE/hr 20% opacity as a 6 minute average fugitive dust shall not exceed 20%, 3 min. RACM for fugitive dust emissions	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 17-11(A)		Y	Y	Y	Y	Y		OR - Minimum scrubber water flow and header pressure
P004	no applicable limits	17-11 17-07		Y	Y	Y	Y	Y	Y	OR - Exclusive combustion of natural gas ET - None Required.
P011	1.3lbs PE/hr, fugitive dust 0.68 lb/hr, 1.3 PM10/hr,0.65 lb fugitive PM10/hr, Pb fugitive 0.01 lb/hr., Pb stack emissions0.06 lb/hr, 20% stack opacity, RACM	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 17-11		Y	Y	Y	Y	Y		ET - Stack Tests & EPA Method 9

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P022	1..3lbs PE/hr, fugitive dust 0.68 lb/hr, 1.3 PM10/hr,0.65 lb fugitive PM10/hr, Pb fugitive 0.01 lb/hr., Pb stack emissions0.06 lb/hr, 20% stack opacity, RACM	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 17-11(A)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP ET - EPA Methods 1-5, 9
P023	0.56lbs PE/hr, fugitive dust 6.0 lb/hr, 0.56 PM10 PE/hr,6.0 lb fugitive PM10/hr, VOC 0.1 lb/hr, 20% stack opacity, RACM	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 17-11(A)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP ET - EPA Methods 1-5, 9 VOC Emission factors
P012	0.006 gr PE/dscf, 20% stack opacity, RACM	17-07(A) 17-07(B) 17-08(B) 17-11(B) 15-06(D)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP ET - EPA Methods 1-5, Method 9
P017	5.77 lb PE/hr 20% stack opacity, 6 min. average RACM for fugitive dust emissions	17-07(A) 17-07(B) 17-08(B) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP Range ET - EPA Methods 1-5, Method 9
P018	6.8 lbs methyl formate/hr, 0.01 lb PM/hr,20% fugitive opacity-3 min. aver., 20% stack opacity- 6 min. average, RACM for fugitive dust emissions	31-05(A)(3) 17-07(A) 17-07(B) 17-08(B) 21-07(G)(2) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP & control efficiency. Sand heater must be employed. Use minimum gassing time. ET - EPA Method 9, emission factors
P025	6.3 lbs methyl formate/hr, 0.04 lb PM/hr., 20% stack opacity- 6 min. average, RACM for fugitive dust emissions	31-05(A)(3) 17-07(A) 17-08(B) 21-07(G)(2) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP & control efficiency. Sand heater must be employed. Use minimum gassing time. ET - EPA Method 9, emission factors
P024	0.26 lb TEA/hr, 0.35 lb PE/hr, 20% as 6 min. ave.	31-05(A)(3) 17-07(A) 17-11(B) 21-07(G)(2)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP, control & capture efficiency, scrubber liquor PH, operating hours, limit on catalyst use, packed tower ÄP. ET - EPA Methods 9, 18

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P026	0.024 lb PE/hr, 0.04 lb CO/hr, 0.18 lb Nox/hr, 1,75 OC/hr, 20% as 6 min. ave.	31-05(A)(3) 17-07(A) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Exclusive use of natural gas ET - EPA Methods 1-5, 7, 9, 10
P027	13 lbs methyl formate/hr, 0.01 lb PM/hr, 0.44 PM/hr fugitives, 20% stack opacity-6 min. average, RACM for fugitive dust emissions	31-05(A)(3) 17-07(A) 17-08(B) 17-11(B) 21-07(G)(2)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP, control & capture efficiency, scrubber liquor PH, operating hours, limit on catalyst use, packed tower ÄP. ET - Methods 9, 18
P015	0.024 lb PE/hr, 0.04 lb CO/hr, 0.18 lb Nox/hr, 1,75 OC/hr, 20% as 6 min. ave.	31-05(A)(3) 17-07(A) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Exclusive use of natural gas ET - EPA Methods 1-5, 7, 9, 10
P016	.02 lb PM/MMBTU, .024 lb PM/MMBTU 02 lb CO/MMBTU, .024 lb CO/MMBTU .10 lb Nox/MMBTU, .12 lb NOx/hr 5% stack opacity - 3 min. ave.	31-05(A)(3) 17-07(A) 17-11(B)		Y	Y	Y	Y	Y	Y	OR - Exclusive use of natural gas ET - EPA Methods 1-4, 7, 22
P902	0.006 gr PE/dscf, 2.11 lbs PM/hr, 20% stack opacity, RACM, 9.02 lbs/hr	17-07(A) 17-07(B) 17-08(B) 17-11(B) 15-06(D)		Y	Y	Y	Y	Y	Y	OR - Baghouse ÄP, Scrubber water pressure and flow ET - EPA Methods 1-5, 9
P901	0.006 gr PE/dscf, 2.11 lbs PM/hr, 20% stack opacity, RACM, 9.02 lbs/hr	17-07(A) 17-07(B) 17-08(B) 17-11(B) 15-06(D)		Y	Y	Y	Y	Y	Y	OR - Operating hour restriction, Max. Weight of castings, Baghouse ÄP ET - EPA Methods 1-5, 9, 25
Z015	photochemically reactive materials forbidden	21-07(G)(2)		N	Y	Y	Y	Y	Y	OR - None required ET - Compliance demonstrated by Record Keeping.

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

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.

C **Instructions for Part III:**

C 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.

C 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.

C 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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