

Statement of Basis For Title V Permit

Company Name	Ormet Primary Aluminum Corp.	
Premise Number	0656000001	
What makes this facility a Title V facility?	PE, MACT (RRR and LL)	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	
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.	No	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
None			

▼ **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												
B004, B005, B006	0.020 # PE /mmbtu	17-10 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - burn only # 2 fuel oil (M,R,Rp added) ET - # 2 fuel oil considered inherently clean ET(B006) - natural gas considered inherently clean
B004, B005, B006	20% VE	17-07 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - burn only # 2 fuel oil (M,R,Rp added) ET - # 2 fuel oil considered inherently clean ET(B006) - natural gas considered inherently clean
B004, B005	1.6 # SO2 /mmbtu	18-06 (D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - burn only # 2 fuel oil (M,R,Rp added) ET - # 2 fuel oil considered inherently clean
B006	PE < 0.24 #/hr, < 1.05 TPY Nox < 1.68#/hr, < 7.36 TPY	31-05	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - burn only natural gas ET - natural gas considered inherently clean
F002	VE 6min.60	17-07 (B)(4)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Weekly VE checks used to determine adequacy of control measures (includes R, Rp)
F002, F003	RACM	17-08 (B)(8,9)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Weekly VE checks used to determine adequacy of control measures (includes R, Rp)
F003	VE 20% as 3-min avg	17-07 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Weekly VE checks used to determine adequacy of control measures (includes R, Rp)

P022, P035, P036, P072, P101-3, P134, P203, P213-7, P955 - P979 P919, P920, P923	RACM	17-08 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Daily VE checks used to determine adequacy of control measures (includes R, Rp)
P022, P035, P036, P072, P101-3, P134, P203, P213-7, P901-5, P955 - P978, P919, P920, P923	VE 20% as 3-min avg	17-07 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Daily VE checks used to determine adequacy of control measures (includes R, Rp)
P022, P035, P036, P072, P101, P103, P134, P203, P213-7, P230-2, P233, P235, P236, P955 - P979, P919, P920,	VE 20% as 6-min avg	17-07 (A)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16

P919	PE < 13.6 #/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P920	PE < 9.79 #/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P923	0.30 gr/dscf, no Ves from baghouse stack, 60.51 TPY	31-05	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Pressure drop to be established during emissions testing. M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible.
P022	PE < 6.85 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P035	PE < 39.7 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16

P036, P103	PE < 22.4 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P072, P134	PE < 28.0 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P101	PE < 12.3 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P203	PE < 17.7 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P213 - 7	PE < 50.0 #/hr combined	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16

P230-2	PE < 4.76 #/hr	17-11 (B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
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P080	Melt stack: PE < 0.09 #/hr, 0.39 tpy; SO2 < 0.18 #/hr, 0.08 tpy; VOC < 0.84 #/hr, 0.37 tpy; CO < 1.05 #/hr, 4.60 tpy; NOx < 1.80 #/hr, 7.88 tpy; Hold stack: PE < 1.836 #/hr, 8.04 tpy; SO2 < 0.007 #/hr, 0.032 tpy; VOC < 0.034 #/hr, 0.15 tpy; CO < 0.42 #/hr, 1.84 tpy; NOx < 0.72 #/hr, 3.15 tpy; Casting: SO2 < 0.15 #/hr, 0.66 tpy; VOC < 1.05 #/hr, 4.60 tpy; NOx < 0.08 #/hr, 0.35 tpy	31-05		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 15,000 #/hr production rate limit and 1.63 cf Cl/ton Al produced chlorine consumption limit, each with appropriate M, R, Rp requirements. ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P080	VE < 5% 6-min avg	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	ET - None normally required for opacity alone.

P080, P233, P235	MACT RRR		Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - MACT requirements
P233, P235	PE < 1.0 #/hr, SO2 < 0.05 #/hr, OC < 0.24 #/hr, CO < 2.75 #/hr, NOx < 11.13 #/hr, HCl < 0.33 mg/m ³	31-05	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - None - 'Static' emission factor calculation at maximum capacity determines compliance.
P236	PE < 0.0151 #/hr 0.066 tpy; SO2 < 0.0073 #/hr 0.032 tpy; VOC < 0.0641 #/hr 0.2808 tpy; CO < 0.2420 #/hr 1.06 tpy; NOx < 1.2098 #/hr 5.2989 tpy; F < 0.2539 #/hr 1.11 tpy	31-05	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR -Baghouse operational parameter monitoring (pressure drop) provides indication of ongoing compliance with the emissions limit. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible.
P901 - P905	PE < 0.030 gr/dscf	17-08 (B)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P955 - P978	TF < 1.5 kg/mg	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - MACT - LL requirements

P955 - P978	PE < 12.6 #/hr	17-11 (A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P955 - P978	SO2 < 240 #/hr	18-06 (E)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance based on mass balance using monitoring of anode usage and sulfur content.
P979	mill: 0.010 gr/dscf, 1.55 #/hr, 6.76 tpy silo vents: 0.010 gr/dscf or no VE, 0.0005 tpy	31-05	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR -Baghouse operational parameter monitoring (broken bag detectors) provides indication of ongoing compliance with the emissions limit. PE CEMS technology not yet feasible. ET - None - per Ohio EPA Engineering Guide 16
P979	VE 10% as 3-min avg	31-05	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Daily VE checks used to determine adequacy of control measures (includes R, Rp)
Z014 (R001)	PE < 0.551 #/hr	17-11	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - 98% eff particulate filter required. ET - None - per Ohio EPA Engineering Guide 16
P900, P999	P900, P999 combined: TF < 0.20 #/ton, POM < 0.18 #/ton	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	MACT - LL requirements
P996-8	P996 - 8 combined: TF < 0.20 #/ton, POM < 0.18 #/ton	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	MACT - LL requirements
P900, P996-9	SO2 < 141 #/hr	18-06 (D)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P900, P996-9	PE < 19.3 #/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P900, P996-9	VE 20% as 6-min avg	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M, R, Rp - ESP operational parameter monitoring (voltage, current) provides indication of ongoing compliance with the emissions limit. ET - None normally required for opacity alone.

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

▼ **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 OAC rule 3745-31-05) 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 OAC rule 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. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- 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. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and 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 the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.

4. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.