

Statement of Basis For Title V Permit

Company Name	Ormet Aluminum Mill Products Corporation	
Premise Number	1756000014	
Number of Non-insignificant Emissions Units	38	
What makes this facility a Title V facility?	Nox and OC emissions greater than 100 TPY.	
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, B002, B003.	None	17-11		N	N	N	N	N	N	Exempt because UMRE is <10 #/hr and only natural gas is used.
B001, B002, B003.	None	17-07		N	N	N	N	N	N	Exempt because 3745-17-11 is not applicable.
B016, B017, B018, B019, B020, B021, B025, B027, B028 B029, B030.	0.020 pound per million BTU actual heat input.	17-10 (B)(1)		Y	Y	Y	Y	Y	N	Limited to burning only natural gas.
B016, B017, B018, B019, B020, B021, B025, B027, B028.	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	
B028, B029, B030.		31-05		Y	Y	Y	Y	N	N	Each EU is limited to 95,589,120 cubic feet of natural gas per calendar year. Compliance determined with M & R.
F001	Paved- No VE's except 6 min/60 min period	17-07 (B)(4)		N	Y	Y	Y	Y	N	
F001	Unpaved- No VE's except 13 min/60 min period	17-07 (B)(5)		N	Y	Y	Y	Y	N	

F001	Reasonably available control measures to minimize or eliminate VE's	17-08		N	Y	Y	Y	Y	N	
F002	20% opacity as a 3 min average	17-07 (B)(1)		N	Y	Y	Y	Y	N	
F002	Reasonably available control measures to minimize or eliminate VE's	17-08		N	Y	Y	Y	Y	N	
P006	121.2 #/hr	18-06		N	N	N	N	Y	N	EU burns only natural gas. Testing if required.
P006	16.6 #/hr	17-11 (A)(2)		N	Y	Y	Y	Y	N	
P006	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	

P006, P007, P008, P010, P020, P021, P022.	0.40 lb of PM per ton of feed/charge (Not processing only clean charge), 0.80 lb of PM per ton of feed/charge (processing only clean charge), 2.1 x 10 ⁻⁴ gr of D/F TEQ per ton of feed/charge (Not processing only clean charge), 0.40 lb of HCl per ton of feed/charge.	40 CFR 63-RRR		Y	Y	Y	Y	Y	Y	All requirements as contained in 40 CFR Part 63 Subpart RRR.
P007 P008	120.6 #/hr 75.6 #/hr	18-06		N	N	N	N	Y	N	EU burns only natural gas. Testing if required.
P007 P008	16.5 #/hr 10.9 #/hr	17-11 (A)(2)		N	Y	Y	Y	Y	N	
P007, P008.	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	

P010, P020, P022.	N/A	18-06		N	Y	Y	Y	Y	N	Limit is less stringent than the limit established under 3745-31-05.
P010, P020, P022.	N/A	17-11 (A)(2)		N	Y	Y	Y	Y	N	Limit is less stringent than the limit established under 3745-31-05.
P010, P020, P022.	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	
P010	Particulate - 0.141 pounds per ton metal processed, SO2 - 0.6 pounds/m mcf gas consumed NOx - 140 pounds/m mcf gas consumed CO - 35 pounds/m mcf gas consumed OC - 5.8 pounds.m mcf gas consumed	31-05		Y	Y	Y	Y	Y	N	EU is limited to 284,594,880 cubic feet of natural gas per calendar year. Compliance determined with M & R.

P020	Particulate - 2.2 pounds/hour and 9.6 tons/year SO2 - 0.05 pounds/hour and 0.22 tons/year NOx - 4.05 pounds/hour and 17.75 tons/year CO - 2.8 pounds/hour and 11.92 tons/year	31-05		N	Y	Y	Y	Y	N	
P021	None	31-05		N	N	N	N	N	N	
P022	Particulate - 2.2 pounds/hour and 9.6 tons/year SO2 - 0.05 pounds/hour and 0.205 tons/year NOx - 3.29 pounds/hour and 39.0 tons/year CO - 2.8 pounds/hour and 11.92 tons/year	31-05		Y	Y	Y	Y	Y	N	EU is limited to 650 million cubic feet of natural gas per rolling 365 day period. Compliance determined with M & R.
P023, P026, P033	491.8 #/hr 441.3 #/hr	18-06		N	N	N	N	Y	N	EU burns only natural gas. Testing if required.
P023, P026, P033	47.05 #/hr 45.5	17-11		N	Y	Y	Y	Y	N	

P023, P026, P033	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	
P012, P013	384.4 #/hr	18-06		N	N	N	N	N	N	No source of SO2 associated with this source.
P012, P013	43.6 #/HR	17-11		N	Y	Y	Y	Y	N	
P012, P013	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	
P024	N/A	18-06		N	Y	Y	Y	Y	N	Limit is less stringent than the limit established under 3745-31-05.
P024, P025, P032, P036	N/A	17-11		N	N	N	N	N	N	Exempt because UMRE is <10 #/hr and only natural gas is used..
P024, P025, P032, P036	N/A	17-07		N	N	N	N	N	N	Exempt because 3745-17-11 is not applicable.
P024	Particulate - 5 pounds/m mcf gas consumed SO2 - 0.6 pounds/m mcf gas consumed NOx - 140 pounds/m mcf gas consumed CO - 35 pounds/m mcf gas consumed OC - 5.8 pounds/m mcf gas consumed	31-05		Y	Y	Y	Y	Y	N	EU is limited to 228,110,400 cubic feet of natural gas per calendar year. Compliance determined with M & R.
P025	92.8 #/hr	18-06		N	N	N	N	Y	N	EU burns only natural gas. Testing if required.
P025	N/A	31-05		Y	Y	Y	Y	Y	N	EU is limited to 260,697,600 cubic feet of natural gas per calendar year. Compliance determined with M & R.
P032	237.1 #/hr	18-06		N	N	N	N	Y	N	EU burns only natural gas. Testing if required.

P032	PM - 5.0 tons per year SO2 - 3.0 tons per year.	31-05		N	Y	Y	Y	Y	N	
P033	None	31-05		N	N	N	N	N	N	No limits contained in PTI.
P036	Particulate - 5 pounds/mcf gas consumed SO2 - 0.6 pounds/mcf gas consumed NOx - 140 pounds/mcf gas consumed CO - 35 pounds/mcf gas consumed OC - 5.8 pounds/mcf gas consumed	31-05		N	Y	Y	Y	Y	N	
P037, P040, P041.	N/A	17-11		N	N	N	N	N	N	Limit is less stringent than the limit established under 3745-31-05.
P037, P040, P041.	20% opacity	17-07 (A)		N	Y	Y	Y	Y	N	
P037, P040, P041.	0.01 pounds PM per ton of feed and 0.04 pounds HCL per ton of feed.	40 CFR 63-RRR		Y	Y	Y	Y	Y	Y	All requirements as contained in 40 CFR Part 63 Subpart RRR.

P037	1.44 #/hr PM, 3.15 #/hr HCL	31-05		N	Y	Y	Y	Y	N	
P040	0.60 #/hr and 0.60 TPY PM, 1.2 #/hr and 1.3 TPY HCL	31-05		N	Y	Y	Y	Y	N	
P041	0.90 #/hr and 0.60 TPY PM, 1.2 #/hr and 1.3 TPY HCL	31-05		N	Y	Y	Y	Y	N	
P038	3.62 pounds VOC per hour. Only Isopar L lubricant shall be used in this emissions unit.	31-05		N	Y	Y	Y	Y	N	
P039	None	None		N	N	N	N	N	N	No federally enforceable applicable requirements apply to this source.

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.