

## Statement of Basis For Title V Permit

Company Name	Osco Industries, Inc., Portsmouth	
Premise Number	07-73-01-0001	
Number of Non-insignificant Emissions Units	19	
What makes this facility a Title V facility?	Exceeded the 100 TPY threshold for particulate matter	
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	

**•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							
B003	20% opacity as a 6-minute average	3745-17-07(A)	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas in this emissions unit. Monitoring, record keeping, and reporting for each day when a fuel other than natural gas is burned.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1) if required.
	0.020 lbs of PM per mMBTU	3745-17-10	N	Y	Y	Y	Y	N	N	OR - The permittee shall burn only natural gas in this emissions unit. Monitoring, record keeping, and reporting for each day when a fuel other than natural gas is burned.  ET - Compliance shall be determined by dividing the emission factor of 4.5 pounds per million cubic feet (AP-42, Table 1.-1) by the heat content of the natural gas 1000 mMBTU per million cubic feet.
	NA	3745-23-06	N	N	N	N	N	N	N	This facility is located in Scioto County which is not identified as a Priority I area. Therefore, this existing NOx emissions unit is exempt from the requirements established in OAC rule 3745-23-06.
F001	10.2 lbs/hr of PM for F001 & P013 combined	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	NA	3745-31-05(A) PTI 07-092		N	N	N	N	N	N	Compliance with OAC rule 3745-17-11 and 3745-17-07 is compliance with BAT.
F002	9.3 lbs/hr of PM for F002 & F003 combined	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.

	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required
F003	9.3 lbs/hr of PM for F002 & F003 combined	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
F004	10 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	0.1 lb/hr of PM	3745-31-05(A) PTI 07-473	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the Cleaning Room baghouse, of all sources vented to the baghouse, shall not exceed 25.7 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
F007	0.30 lbs/hr of PM	3745-31-05(A) PTI 07-414	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the East Foundry Dust Collection baghouse, of all sources vented to the baghouse, shall not exceed 0.015 gr/dscf and 8.49 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.

	No visible emissions	3745-31-05(A) PTI 07-414	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	NA	3745-17-11	N	N	N	N	N	N	N	The emission limit based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
	NA	3745-17-07(A)	N	N	N	N	N	N	N	The emission limit based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
P002	8.0 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
P004	10 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
P005	6.2 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.

P013	0.69 lbs/hr of PM	3745-31-05(A) PTI 07-217	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the West Dust Collection baghouse, of all sources vented to the baghouse, shall not exceed 50 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	10.2 lbs/hr of PM from F001 & P013 combined	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
P014	0.13 lbs/hr of PM	3745-31-05(A) PTI 07-275	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the Cleaning Room baghouse, of all sources vented to the baghouse, shall not exceed 25.7 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	NA	3745-17-11	N	N	N	N	N	N	N	The emission limitation based on this rule is less stringent than the emission limit established pursuant to OAC Rule 3745-31-05.
P015	10 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.

	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
P016	0.03 lbs/hr of PM	3745-31-05(A) PTI 07-334	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the Cleaning Room baghouse, of all sources vented to the baghouse, shall not exceed 25.7 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	10 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
P018	0.06 lbs/hr of PM/PM <sub>10</sub>	3745-31-05 PTI 07-386	N	Y	Y	Y	Y	Y	N	Total allowable particulate emissions from the Cleaning Room Baghouse, of all sources vented to the baghouse, shall not exceed 25.7 pounds of particulate per hour.  OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	NA	3745-17-11	N	N	N	N	N	N	N	The emission limit based on this rule is less stringent than the emission limit established pursuant to OAC rule 3745-31-05.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
P906 & P907	20.3 lbs/hr of PM	3745-31-05(A) PTI 07-380	N	Y	Y	Y	Y	Y	N	OR - Venturi scrubber operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.

	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	NA	3745-18-06	N	N	N	N	N	N	N	This emissions unit has a rated capacity less than 1,000 pounds per hour process weight input. Therefore, this emissions unit is exempt from the emissions limitations established in OAC rule 3745-18-06(E).
	NA	3745-17-11	N	N	N	N	N	N	N	The emission limitation based on this rule is less stringent than the emission limit established pursuant to OAC Rule 3745-31-05.
P019 (Z001)	8.0 lbs/hr of PM	3745-17-11	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	20% opacity as a 6-minute average	3745-17-07 (A)	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
P020 (Z002)	0.015 gr/dscf of PM	3745-31-05(A) PTI 07-367	N	Y	Y	Y	Y	Y	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.
	No visible emissions	3745-31-05(A) PTI 07-367	N	Y	Y	Y	Y	N	N	OR - Baghouse operational parameters, control device monitoring, record keeping, reporting requirements included in terms and conditions.  ET - Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1), if required.
	NA	3745-17-11	N	N	N	N	N	N	N	The emission limitation based on this rule is less stringent than the emission limit established pursuant to OAC Rule 3745-31-05.
	NA	3745-17-07(A)	N	N	N	N	N	N	N	The emission limitation based on this rule is less stringent than the emission limit established pursuant to OAC Rule 3745-31-05.
F008 (Z003)	NA	3745-17-07(B)	N	N	N	N	N	N	N	This facility is located in Scioto County which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, this emissions unit is exempt from the fugitive dust control requirements and visible emission limitations established in OAC rule 3745-17-08 and 3745-17-07, respectively.

EU = emissions unit id  
OR = operational restriction  
M = 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 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, record keeping, 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.
- 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.