

Statement of Basis For Title V Permit

Company Name	Ross Incineration	
Premise Number	02-47-05-0278	
Number of Non-insignificant Emissions Units	21	
What makes this facility a Title V facility?	Emissions of Nitrogen Oxides, and 40 CFR, Part 63, Subpart EEE	
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	
1 through 6	N	Y	40 CFR, Part 63, Subpart DD
7 through 13	N	Y	40 CFR, Part 68
14 through 42	N	Y	40 CFR, Part 61, Subpart FF
43	N	Y	40 CFR, Part 264

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.

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

EU(s)	Limitation	Basis		O R	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
N001	PM emissions not to exceed 0.047 grains per dscf at 7% O2	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	PM emissions not to exceed 11.5 lbs/hr	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	PM emissions not to exceed 50.37 TPY	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	Nox emissions not to exceed 158.1 pounds per rolling 24-hour average basis	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	Sox emissions not to exceed 15.1 lbs/hr	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R , Rp, ET - If required
N001	Sox emissions not to exceed 66.14 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05
N001	CO emissions not to exceed 41 lbs/hr	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	CO emissions not to exceed 179.6 TPY	N	Y	N	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05
N001	THC emissions not to exceed 2.4 lbs/hr	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	THC emissions not to exceed 10.5 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required

N001	Pb emissions not to exceed 11.5 lbs/hr	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Pb emissions not to exceed 0.75 TPQ	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Pb emissions not to exceed 3.0 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Hcl emissions not to exceed 4.0 lbs/hr	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Hcl emissions not to exceed 17.5 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Hg emissions not to exceed 1.85 lbs/hr	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Hg emissions not to exceed 1.13 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Be emissions shall not exceed 0.004 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	Dioxin and Furan emissions shall not exceed 1.8E-5 TPY	N	Y	N	N	N	N	N	N	Other - OAC rule 3745-31-05 M, R, Rp, ET - If required
N001	No visible fugitive emissions	N	Y	N	Y	Y	Y	N	N	Other - OAC rule 3745-31-05 ET - If required
N001	Nox emissions shall not exceed 196.2 TPY	N	Y	Y	Y	Y	Y	Y	N	Other - OAC rule 3745-31-05 OR - Monthly emission limits to establish a rolling average
N001	Visible stack emissions shall not exceed 20% opacity as a six-minute average	17-07(A)	N	N	Y	Y	Y	Y	N	

N001	Be emissions shall not exceed 10 grams per 24-hour period	N	Y	N						Other - 40 CFR, Part 61, Subpart C
N001	40 CFR, Part 63, Subpart EEE	N	Y	N	N	N	N	N	N	Other - 40 CFR, Part 63 M, R, Rp, ET - Rule not effective yet.
N001	40 CFR, Part 61, Subpart C	N	Y	N	N	N	N	N	N	Other - 40 CFR, Part 61 M, R, Rp, ET -Through following the rule
N001	40 CFR, Part 61, Subpart E	N	Y	N	N	N	N	N	N	Other - 40 CFR, Part 61 M, R, Rp, ET - through following the rule
N001	40 CFR, Part 63, Subpart DD	N	Y	N	N	N	N	N	N	Other - 40 CFR, Part 63 M, R, Rp, ET - through following the rule
T018	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T019	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T020	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T021	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T022	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T023	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T024	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T025	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T026	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T026	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T028	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable

T029	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T030	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T031	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T035	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T035	Combined OC emissions from T035, T036, and T037 shall not exceed 19.8 lbs/day	N	Y	N	N	N	N	Y	N	Other - OAC rule 3745-31-05
T036	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T036	Combined OC emissions from T035, T036, and T037 shall not exceed 19.8 lbs/day	N	Y	N	N	N	N	Y	N	Other - OAC rule 3745-31-05
T037	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T037	Combined OC emissions from T035, T036, and T037 shall not exceed 19.8 lbs/day	N	Y	N	N	N	N	Y	N	Other - OAC rule 3745-31-05
T039	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable
T039	Combined OC emissions for T039 and T040 shall not exceed 1.24 TPY	N	Y	N	N	N	N	Y	N	Other - OAC rule 3745-31-05
T040	submerged fill	21-07(D)(2)	N	Y	N	N	N	N	N	OR - Required to be equipped with submerged fill M, R, Rp, ET - not applicable

T040	Combined OC emissions for T039 and T040 shall not exceed 1.24 TPY	N	Y	N	N	N	N	Y	N	Other - OAC rule 3745-31-05
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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

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 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 comments. 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.

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.