

Statement of Basis For Title V Permit

Part I - General

Company Name	St. Marys Foundry		
Premise Number	03 06 01 0004		
What makes this facility a Title V facility?	PM10		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 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		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A		
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A		

Part II (State and Federally Enforceable Requirements)

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1		40 CFR 64	Compliance Assurance Monitoring (CAM) requirements apply to P002, P011, P012, and P018.

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.

Part III (Requirements Within the State and 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												
F001 F002 F003 F008 F009 F010 F012 F013 F015 F016*	8.0 tons individual HAP /yr, 20.0 tons combined HAP /yr*	77-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - iron, sand throughput restrictions M - Iron, sand throughput tracking information allows for emissions factor calculation of emissions. ET - None - per Ohio EPA Engineering Guide 16 * per rolling 12-month period, for all emissions units combined (fugitive emissions)
F001	2.08 lbs PE /hr, 9.13 tons /yr* 1.04 lbs PM10 /hr, 4.56 tons /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16 * fugitive emissions
F002	2.78 lbs PE /hr, 12.2 tons /yr* 1.38 lbs PM10 /hr, 6.04 tons /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16 * fugitive emissions

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
F003	2.50 lbs PE /hr, 11.0 tons/yr* 1.24 lbs PM10 /hr, 5.43 tons /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16 * fugitive emissions
F001	2.30 lbs OC /hr, 10.1 tons /yr*	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance. * fugitive emissions
F002	3.06 lbs OC /hr, 13.4 tons /yr*	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance. * fugitive emissions
F003	2.75 lbs OC /hr, 12.1 tons /yr*	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance. * fugitive emissions
F001 F002 F003 F015 F016	20% opacity*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None normally required for opacity alone. * fugitive emissions
F015 F016*	5.62 tons PE /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16 * for F015 and F016 combined (fugitive emissions)
F015 F016*	0.62 tons Pb /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Daily visible emissions checks - also for Pb PE. ET - None - per Ohio EPA Engineering Guide 16 * for F015 and F016 combined (fugitive emissions)
P002 P011 P012	9.56 lb/hr* 10.4 lb/hr* 14.2 lb/hr*	17-11 (B)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	M - CAM requirements are applicable (baghouse). * pollutant is PE

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P002 P011 P012	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - CAM for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.
P009	9.96 lb/hr	17-11 (B)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
P009	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.
P016	0.34 lbs PE /hr, 1.49 tons /yr, 0.01 gr /DSCF	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16 (recent emissions testing was performed demonstrating compliance)
P016	0.33 lbs OC /hr, 1.45 tons /yr	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - 'Static' emission factor calculation at maximum capacity determines compliance. ET - None - per Ohio EPA Engineering Guide 16 (recent emissions testing was performed demonstrating compliance)
P016 P023	5% opacity	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.
P018	0.89 lbs PE /hr, 3.90 tons /yr, 0.02 gr /DSCF	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - CAM requirements are applicable (baghouse). ET - None - per Ohio EPA Engineering Guide 16
P019	0.64 lbs PE /hr, 2.80 tons /yr 0.45 lbs PM10 /hr, 1.96 tons /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - The control device (baghouse) serving this emissions unit has CAM applicable under other emissions units. ET - None - per Ohio EPA Engineering Guide 16

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P018 P019	20% opacity	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - CAM for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.
P020	2.56 lbs PE /hr, 11.2 tons /yr 1.50 lbs PM10 /hr, 6.57 tons /yr	31-05		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE) M - Tracking for any day where a fuel other than natural gas was used. Also, daily visible emissions checks. ET - None - per Ohio EPA Engineering Guide 16
P020	21.2 lbs NOx /hr, 5.56 tons/yr	31-05		N	Y	N	N	N	N	N	N	N	N	N	OR - must use only natural gas M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
P020	1.07 lbs CO /hr, 4.69 tons /yr	31-05		N	Y	N	N	N	N	N	N	N	N	N	OR - must use only natural gas M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
P020	20% opacity	31-05		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Must burn only natural gas (an inherently clean fuel for PE and opacity) M - Tracking for any day where a fuel other than natural gas was used. ET - None normally required for opacity alone.
P023	0.03 gr /DSCF, 3.94 ton PM10 /yr	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
R001	7.48 lbs OC /hr*	31-05		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' emission factor calculation at maximum capacity determines compliance. * fugitive emissions, from coating operations

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
R001	32.8 tons OC /yr*	31-05		N	N	N	N	N	N	N	N	N	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination * fugitive emissions, from coating operations
R001	2300 lbs OC /mo, 13.8 tons /yr*	31-05		N	N	Y	N	N	Y	N	Y	N	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination * fugitive emissions, from clean-up operations
R001	3.46 lbs PE /hr, 15.2 tons/yr*	31-05		N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - This operation employs a 'pour-over' wand coating application method. Therefore, particulate emissions from 'overspray' are considered to be negligible, and assumed to be in compliance with the limitations. ET - None - per Ohio EPA Engineering Guide 16 * any particulate would be fugitive emissions

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

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 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.
2. 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.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.