

Statement of Basis For Title V Permit

Company Name	Technocast, Inc.	
Premise Number	02-85-01-0034	
Number of Non-insignificant Emissions Units	24	
What makes this facility a Title V facility?	PM-10	
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	
A.1.	25		This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from Ohio EPA.

- **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 (374 5-)	Other							
F003, F005, F006, F007, F008, F018, F019, F020, F022, F027, F028, F029, F030, F031, P011, P014, P019, P020, P021, P023, P025, P026, P027	none	-17-08(B)	N	N	N	N	N	N	N	Exempt. Emissions units located in a non-Appendix A area.
F003, F005, F006, F007, F008, F018, F019, F020, F022, F031, F027, F028, F029, F030, P011, P014, P019, P020, P021, P023, P025, P026, P027	none	-17-07(B)	N	N	N	N	N	N	N	Exempt. Emissions units located in a non-Appendix A area.
F003	PE: 3.84 lbs/hr	-17-11(B)(2)	N	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F003, F029	PE: 0.006 gr/dscf	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F003, F018, F019, F031, F029	20% opacity	-17-07(A)(1)	N	Y	Y	Y	Y	N	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F003	yPE: 38.4 tons per year	N	Y	N	Y	Y	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-1511.

F005	PE: 3.84 lbs/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677.
F005	PE: 9.9 tons/yr	N	Y	N	Y	Y	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677.
F005	VOC: 1.68 lbs/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	VOC: 4.4 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	SO2: 0.24 lb/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	SO2: 0.62 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	NOx: 0.12 lb/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	Nox:: 0.30 ton/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	CO: 24 lbs/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	CO: 61.9 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677, limit based on maximum production and uncontrolled emission factor.
F005	20% opacity, as 3-minute average	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677.
F006	PE: 0.006 gr/dscf and 0.54 lb/hr from stack	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column. Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-10079.

F006	5.1 lbs/hr fugitive PE	N	Y	Y	N	N	N	N	N	OR: The collection efficiency of the capture hoods is considered adequate if visible emissions do not exceed 20% opacity, as a three-minute average. Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-10079.
F006	VOC: 0.42 lb/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-10079, limit based on maximum production and uncontrolled emission factor.
F006	SO2: 184.1 lbs/hr	-18-06	N	N	N	N	N	N	N	No M,R,Rp is required because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
F007	20% opacity	-17-07(A)(1)	N	Y	Y	Y	Y	N	N	OR: Pressure drop across scrubber shall be at least 2 inches of water column; water flow rate shall be at least 94.2 gallons per minute.
F007	PE: 16.23 lbs/hr	-17-11(B)(2)	N	Y	Y	Y	Y	Y	N	OR: Pressure drop across scrubber shall be at least 2 inches of water column; water flow rate shall be at least 94.2 gallons per minute.
F007	none	-21-07(G)(2)	N	N	N	N	N	N	N	Exempt. Source not located in a "Priority I" county.
F007	PE: 0.015 gr/dscf	Y	N	Y	Y	Y	Y	Y	N	OR: Pressure drop across scrubber shall be at least 2 inches of water column; water flow rate shall be at least 94.2 gallons per minute.
F008	20% opacity	-17-07(A)(1)	N	Y	Y	Y	Y	N	N	OR: Pressure drop across scrubber shall be at least 2 inches of water column; water flow rate shall be at least 94.2 gallons per minute. Pressure drop on baghouse to be maintained between 2 to 7 inches water.
F008	PE: 1.52 lbs/hr and 0.006 gr/dscf (baghouse stack)	N	Y	Y	Y	Y	Y	Y	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9005. OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F008	PE: 1.43 lbs/hr and 0.015 gr/dscf (scrubber stack)	N	Y	Y	Y	Y	Y	Y	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9005. OR: Pressure drop across scrubber shall be at least 2 inches of water column; water flow rate shall be at least 94.2 gallons per minute

F008	0.28 ton/yr fugitive PE	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9005.
F018, F019, F031	PE: 11.02 tons per rolling, 12-month period	N	Y	Y	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(D), PTI 02-13038. OR: 30,940 tons of iron for F018, F019, F031; operating hours limited to 6,900 per rolling, 12-month summation
F018, F019, F031	Pb: 0.339 ton per rolling, 12-month period	N	Y	Y	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(D), PTI 02-13038. OR: 30,940 tons of iron for F018, F019, F031; operating hours limited to 6,900 per rolling, 12-month summation
F018, F019, F031	PE: 0.006 gr/dscf and 1.85 lbs/hr	N	Y	Y	Y	Y	Y	Y	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13038. OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F018, F019, F031	Pb: 0.0086 lb/hr	N	Y	Y	Y	Y	Y	Y	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13038. OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F018, F019, F031	5% opacity limit (baghouse stack)	N	Y	Y	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13038. OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
F018, F019, F031	10% opacity limit (fugitives)	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13038. Visible emission checks to be performed daily, record keeping, and reporting.
F027	OC: 5 lbs/hr	N	Y	N	N	N	N	N	N	Limit from OAC rule 3745-31-05(A)(3), PTI 02-12995. No M,R,Rp is required because the maximum uncontrolled emission rate of OC cannot exceed the limit.
F027	OC: 21.9 tons/yr	N	Y	N	Y	Y	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F027	PE: 0.12 lb/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.

F027	PE: 0.53 ton per year	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F027, F028	20% opacity	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F028	OC: 7.59 lbs/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.No M,R,Rp is required because the maximum uncontrolled emission rate of OC cannot exceed the limit.
F028	OC: 12.6 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F028	PE: 0.24 lb/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F028	PE: 1.05 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12995.
F029	PE: 3.9 lbs/hr	-17-11(B)(2)	N	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column.
P011	PE: 1.02 lbs/hr and 0.01 gr/dscf (stack)	N	Y	Y	Y	Y	Y	Y	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677. OR: Pressure drop on baghouse to be maintained between 2 to 8 inches of water column.
P011	PE: 4.4 tons per year (stack)	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677.
P011	PE: 9.9 tons per year (fugitive)	N	Y	N	Y	Y	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677.
P011	5% opacity	N	Y	Y	Y	Y	Y	N	N	Limit from OAC rule 3745-31-05(A)(3), PTI 02-13677. OR: Pressure drop on baghouse to be maintained between 2 to 8 inches water
P011	20% opacity (fugitive s)	N	N	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-13677. Visible emission checks to be performed daily, record keeping, and reporting.
P014, P019	20% opacity (stack)	-17-07(A)	N	Y	Y	Y	Y	N	N	OR: Pressure drop on baghouse to be maintained between 2 to 8 inches of water column.

P014	PE: 0.39 lb/hr and 0.01 gr/dscf (stack)	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 8 inches of water column. Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12255.
P014	PE: 1.7 tons/yr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12255.
P014	PE: 3.0 tons per year (fugitive)	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12255.
P014	20% opacity (fugitive)	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-12255. Visible emission checks to be performed daily, record keeping, and reporting.
P019	PE: 16.8 lbs/hr	-17-11(B)(2)	N	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 8 inches of water column.
P019	PE: 0.01 gr/dscf	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 8 inches of water column.
P020, P021, P025, P028	none	-21-07(G)(2)	N	Y	Y	Y	Y	N	N	Exempt. Use of photochemically reactive material is prohibited.
P020, P025	methyl formate: 4.2 lbs/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-8471.
P020, P025	PE: 0.05 lb/hr	N	Y	Y	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-8471. OR: Pressure drop across scrubber shall be at least 2 inches; water flow rate shall be at least 94.2 gallons per minute
P021	methyl formate: 6.3 lbs/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-8471.
P023	none	-21-07(G)(2)	N	Y	N	N	N	N	N	Exempt pursuant to OAC rule 3745-21-07(G)(9)(h).

P023	VOC: 9.1 lbs/hr	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-8810.
P023	PE: 0.052 lb/hr	N	Y	Y	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-8810. OR: Pressure drop across scrubber shall be at least 2 inches; water flow rate shall be at least 94.2 gallons per minute
P026	PE:2.72 lbs/hr and 0.006 gr/dscf (stack)	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 8 inches water Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.
P026	PE: 1.78 tons per year (fugitive)	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.
P026	VOC: 0.84 lb/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.
P026	SO2: 367 lbs/hr	-18- 06 (E)	N	N	N	N	N	N	N	No monitoring/recordkeeping required. Maximum uncontrolled SO2 emission rate cannot exceed limit.
P027	PE:.231 lb/hr and 0.006 gr/dscf (stack)	N	Y	Y	Y	Y	Y	Y	N	OR: Pressure drop on baghouse to be maintained between 2 to 7 inches of water column. Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.
P027	PE: 1.34 tons per year (fugitive)	N	Y	N	Y	Y	Y	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.
P027	VOC: 9.36 lb/hr	N	Y	N	N	N	N	N	N	Limit established pursuant to OAC rule 3745-31-05(A)(3), PTI 02-9055.

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 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.

- 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.