

Statement of Basis For Title V Permit

Company Name	The Lubrizol Corporation - Wickliffe Facility	
Premise Number	02-43-15-0025	
Number of Non-insignificant Emissions Units	9	
What makes this facility a Title V facility?	NOx	
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							
B001, B002, B003	20 % opacity	17-07 (A)		Y	Y	Y	Y	N	N	OR - Only natural gas and/or number two fuel oil are permitted to be burned in the emissions unit.
B001, B002, B003	PM: 0.02 lb/mm Btu	17-10 (B)(1)		Y	Y	Y	Y	N	N	OR - Only natural gas and/or number two fuel oil are permitted to be burned in the emissions unit.
B001, B002, B003	SO2: 1.6 lbs/mm Btu	18-06 (D)		Y	Y	Y	Y	N	N	OR - Requirements for the quality of oil burned in the emissions unit.
B005, B006	20 % opacity	17-07 (A)		Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B005, B006	PM: 0.02 lb/mm Btu	17-10 (B)(1)		Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B005, B006	CO: 0.084 lb/mm Btu	N	31-05	Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B005, B006	NOx: 0.14 lb/mm Btu	N	31-05	Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
B005, B006	SO2: 0.006 lb/mm Btu	N	31-05	Y	Y	Y	Y	N	N	OR - Only natural gas is permitted to be burned in the emissions unit.
L003	See Comments	21-09 (O)(2)		Y	Y	Y	Y	N	N	OR - Equipment requirements: cover or remote reservoir; device for draining cleaned parts; vapor pressure requirements or freeboard ratio, water cover, or refrigerated chiller; labeling, waste storage, cover, and drainage requirements. Requirements of OAC rule 3745-21-09(O)(2)(d)(v) do not apply to this emissions unit pursuant to the new exemption added to OAC rule 3745-21-09(O) for cold cleaners that are research and development sources.

P009	20 % opacity	17-07 (A)		N	Y	Y	Y	N	N	OAC rule 3745-17-07(A) applies to 9 engines that are used to operate mechanical equipment and does not apply to engine test stands pursuant to the exemption in OAC rule 3745-17-07(A)(3)(h).
P009	None	18-06		N	Y	Y	Y	N	N	Exempt pursuant to OAC rule 3745-18-06(B).
P009	PM: 0.310 lb/mm Btu	17-11 (B)(5)		N	Y	Y	Y	N	N	The PM limitation applies to 9 engines that are used to operate mechanical equipment. The engine test stands are not subject to OAC rule 3745-17-11 because the uncontrolled mass rate of particulate emissions from the engine test stands is less than 10 pounds per hour and the process weight rate for the engine test stands is equal to zero.
P011, P012	OC: 85% reduction by weight	21-07 (G)(2)		Y	Y	Y	Y	Y	N	OR - The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
P011, P012	None	18-06		N	N	N	N	N	N	Less stringent than BAT limit.
P012	H2S and HCl: 98% removal efficiency by weight	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - Requirements for minimum free sodium hydroxide concentration in scrubber liquor.
P012	VOC: 98% destruction efficiency by weight	N	31-05 (A)(3)	Y	Y	Y	Y	Y	N	OR - Flare operational requirements and the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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.