

Statement of Basis For Title V Permit

Company Name	The Quality Castings Company	
Premise Number	02-85-01-0001	
Number of Non-insignificant Emissions Units	38	
What makes this facility a Title V facility?	PM-10, VOC	
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.	25-03		Facility has emissions units that are subject to the emergency action plan provisions of 3745-25-03.

- **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-)	Ot he r							
F002 - F006,F008,F010,F012,F013,F015-F023, P002,P011-P013, P017,P021,P023,P025- P027,P029,P030,P032- P034,P036,P901-P903	none	-17-08(B)	N	N	N	N	N	N	N	Exempt. Emissions units located in a non-Appendix A area.
F002 - F006,F008,F010,F012,F013,F015-F023, P002,P011-P013, P017,P021,P023,P025- P027,P029,P030,P032- P034,P036,P901-P903	none	-17-07(B)	N	N	N	N	N	N	N	Exempt. No fugitive VE limit for emissions units exempt from 3745-17-08(B).
F008, F019	none	-21-07(G)(2)	N	N	N	N	N	N	N	Exempt by 3745-21-07(G)(9)(i)
F012	SO2:167.3 lbs/hr	-18-06(D)(2)	N	N	N	N	N	N	N	No recordkeeping, monitoring or reporting is required because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
F013,F015, F017, P032, P033, P034	no photochemically reactive material shall be employed	-21-07(G)	N	N	Y	Y	Y	N	N	
F015	PM:0.22 lb/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI

F015,F017	20% opacity as a 3 min. ave.		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
F015	OC: 6 lbs/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
F016	SO2: 184.1 lbs/hr	-18-06	N	N	N	N	N	N	N	No recordkeeping, monitoring or reporting is required because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
F017	PM:0.40 lb/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
F017	20% as a three minute ave.		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
F017	OC:13.5 lbs/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
F017	OC: 22.5 tons per rolling 12-month period		Y	Y	Y	Y	Y	N	N	Synthetic minor PTI OR-production limit of 30,000 tons of iron per any 12-month period.
F018	SO2: 481.5 lbs/hr	-18-06	N	N	N	N	N	N	N	No recordkeeping, monitoring or reporting is required because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
F019,F023,P023, P025, P030, P033, P034, P036	PM: no limit	-17-11	N	N	N	N	N	N	N	Uncontrolled PM emissions are less than 10 lbs/hr - Figure II does not apply. Table I does not apply to facilities in Wayne Co.
P002, P012, P013, P026, P038	PM: 31.33 lbs/hr	-17-11	N	Y	Y	Y	Y	Y	N	OR - pressure drop across baghouse to be maintained between 4 and 6 inches water Common limit, emissions units are operationally united and controlled by a common baghouse.
P002, P012, P013, P021, P026, P038,	20% opacity	-17-07	N	Y	Y	Y	Y	N	N	OR - pressure drop across baghouse to be maintained between 4 and 6 inches water
P021	PM: 10.38 lbs/hr	-17-11	N	Y	Y	Y	Y	N	N	OR - pressure drop across baghouse to be maintained between 4 and 6 inches water
P027	PM: 13.04 lbs/hr	-17-11	N	Y	Y	Y	Y	Y	N	OR- pressure drop on scrubber to be maintained at a minimum of 3.6 inches; scrubber water flow rate to be maintained at a minimum of 136 gpm

P030	none	-21-07(G)(2)	N	Y	Y	Y	Y	N	N	Exempt per 3745-21-07(G)(9)(h). OR - pH of scrubber liquor shall be maintained at or below 4.5
P032	PM: 0.64 lb/hr		Y	N	N	N	N	N	N	Synthetic minor PTI M,R,Rp - not required, PM emissions are not significant
P032	5% opacity		Y	N	N	N	N	N	N	Synthetic minor PTI M,R,Rp - not required, PM emissions are not significant
P032	PM: 2.8 tons/yr		Y	Y	N	N	N	N	N	Synthetic minor PTI OR - production limit of 8550 tons of cores per 12 month period M,R,Rp - not required, PM emissions are not significant
P032	OC: 12.4 lbs/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
P032	OC: 38.46 tons per rolling 12-month period		Y	Y	Y	Y	Y	N	N	Synthetic minor PTI OR - production limit of 8550 tons of cores per 12 month period
P032	methyl formate: 1 2.1 lbs/hr		Y	N	Y	Y	Y	N	N	Synthetic minor PTI
P032	methyl formate: 37.7 tons/yr		Y	Y	Y	Y	Y	N	N	Synthetic minor PTI OR - production limit of 8550 tons of cores per 12 month period
P036	SO2: 782 lbs/hr	-18-06	N	N	N	N	N	N	N	No recordkeeping, monitoring or reporting is required because the maximum uncontrolled emission rate of SO2 cannot exceed the limit.
P901, P903	PM: 46.2 lbs/hr	-17-11	N	Y	Y	Y	Y	Y	N	OR- pressure drop on scrubber to be maintained at a minimum of 3.6 inches; scrubber water flow rate to be maintained at a minimum of 136 gpm Common limit.
P027, P901, P903	20% opacity	-17-07	N	Y	Y	Y	Y	N	N	OR- pressure drop on scrubber to be maintained at a minimum of 3.6 inches; scrubber water flow rate to be maintained at a minimum of 136 gpm
P902	PM: 32.24 lbs/hr	-17-11	N	Y	Y	Y	Y	Y	N	OR - pressure drop across baghouse to be maintained between 3 and 5 inches water
P902	20% opacity	-17-07	N	Y	Y	Y	Y	N	N	OR - pressure drop across baghouse to be maintained between 3 and 5 inches water

EU = emissions unit id
OR = operational restriction
M = monitoring requirementsj

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.