

Statement of Basis For Title V Permit

Company Name	The Timken Company - Harrison Steel Plant (Title V application action - TVP003)	
Premise Number	15-76-00-0613	
Number of Non-insignificant Emissions Units	19	
What makes this facility a Title V facility?	The potential to emit over 100 tpy of the criteria pollutants and 10 tpy of a HAP	
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	
NA			

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
F201	no V.E. for more than 6min each hr. no V.E. for more than 13min each hr.	1 7 - 0 7 - 07(B)(4)/(5) 1 7 - 0 8 - 07(B)(8)/(2)		N	Y	Y	Y	Y	N	OR - no operational restrictions placed on paved our unpaved parking areas our roadways.
K 206	0.21 lb/hr PE 0.94 tpy PE 146 lbs/day OC 26.6 tpy OC 20% V.E.	31-05 17-07(A) 17-11(B) 21-09(U)	PTI 15- 0849	Y	Y	Y	Y	N	N	ET - compliance shown through record keeping and emission factor calculation.
K 207	14.6 lbs/day OC 2.66 tpy OC	31-05 21-09(U)	PTI 15- 0849	Y	Y	Y	Y	N	N	ET - compliance shown through record keeping. If required V.E. opacity will be determined t Method 9.
P222	20% V.E. 55.51 lbs/hr PE	17-07(A) 17-11(B)		Y	Y	Y	Y	Y	N	OR - baghouse #5 pressure drop must fall between 3 and 8 inches of water.
P234	20%, 3 min. ave.	17-07(B)(1) 17-08(B)(3) 18-06(E)(1)		Y	Y	Y	Y	Y	N	OR - this emissions unit shall fire natural gas exclusively.
P258	.0052 gr/dscf 3% V.E at baghouse stack, 6 min 6% V.E. leaving melt shop, 6 min Melt shop 20% charging, 40% tapping Dust handling equip. 10% 244.68 lbs/hr SO ₂	31-05(A)(3) 17-07(A)(1) 17-07(B)(1) 17-11(B) 17-08(B)(3) 18-06(E)(1)	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 60, subpart AA
P259	3% opacity leaving stack, 6 min ave.	31-05 17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11(B)		Y	Y	Y	Y	Y	N	
P264	5.49 lbs/hr PE 20 % opacity as 6 min. ave. 457.84 lbs/hr SO ₂	31-05 17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11 18-06(E)(1)		Y	Y	Y	Y	Y	Y	Misc - This emissions unit shares a common baghouse with outlet grain loading of .0052 per dscf and more restrictive stack opacity limits.

P266	20% opacity as a 3 min. ave.	17-07(A) 17-07(B)(1) 17-08(B)(3) 17-11 18-06(E)(1)	PTI-15 0464	Y	Y	Y	Y	Y	N	OR - Baghouse pressure drop must be between 4.0 - 7.0 inches of water.
P271	0.68 lb/hr PE 20% opacity, 6 min. ave. 20% opacity, 3 min. ave. Minimum baghouse efficiency 99%	31-05 17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11	PTI-15 0464	Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 - 7.0 inches of water. Misc - the 6 tpy PE limit is for P271 & P272.
P272	0.68 lb/hr PE 20% opacity, 6 min. ave. 20% opacity, 3 min. ave. Minimum baghouse efficiency 99% 6 tpy PE	31-05 17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11	PTI-15 0464	Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 - 7.0 inches of water. Misc - the 6 tpy PE limit is for P271 & P272.
P282	.0052 gr/dscf, 6.5 lbs/hr SO2 3.2 lbs/hr PE 195 lbs/day SO2 14.1 tpy PE 2.61tpm SO2 11.75 lbs/hr CO 31.33 tpy SO2 51.44 tpy CO 20% opacity, 6 min. ave.	31-05 17-07(A)(1) 17-07(B) 17-08(B)(3) 17-11 18-06(E)(1)	PTI-15 0575	Y	Y	Y	Y	Y	N	
P286	0.68 lb/hr PE 3.0 tpy PE 20% stack opacity 6 min. ave 20 % fugitive opacity 3 min. ave.	31-05 17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11(B)	PTI-15 0615	Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 - 7.0 inches of water.
P287	0.43 lb/hr of PE 1.88 tpy PE 20% stack opacity 6 min. ave	31-05 17-07(A) 17-11(B)	PTI-15 0849	Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 1.0 - 6.0 inches of water.
P288	0.03 lb/hr PE 0.035 lb/mmBtu CO 0.131 tpy PE 0.42 lb/hr CO 0.14 lb/mmBtu NO _x 1.84 tpy CO 1.68 lb/hr NO _x 7.36 tpy CO	31-05 17-07(B)(1) 17-08(B)(3) 18-06(E)(1)	PTI-15 1096	Y	Y	Y	Y	Y	N	
P292	.0052 gr/dscf 244.68 lb/hr SO ₂ 20% stack opacity 6 min. ave 20% opacity, 3 min. ave	17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11(B) 18-06(E)(1)		Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 -8.0 inches of water.
P296	40.52 lbs/hr 203.93 lb/hr SO ₂ 20% stack opacity 6 min. ave 20% opacity, 3 min. ave	17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11 18-06(E)(1)		Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 3.0 -8.0 inches of water.

Z201	.0052 gr/dscf 20% opacity, 3 min. ave 20% stack opacity 6 min. ave	17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11(B)		Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 -8.0 inches of water.
Z202	.0052 gr/dscf 20% opacity, 3 min. ave 20% stack opacity 6 min. ave	17-07(A)(1) 17-07(B)(1) 17-08(B)(3) 17-11(B)		Y	Y	Y	Y	Y	N	OR - baghouse pressure drop must be between 4.0 -8.0 inches of water.

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 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.

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 each column where "N" is specified, there should be a brief explanation in the "Comments" section. 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.

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.