

Statement of Basis For Title V Permit

Company Name	US Filter Scaltech	
Premise Number	0448011640	
What makes this facility a Title V facility?	Subject to the Refinery MACT and its association with Sunoco, Inc. Refinery. See explanation under PART II	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.	Yes, US Filter Scaltech process is associated with Sunoco, Inc. refinery in Toledo, Ohio. Sunoco, Inc. contracted this process work to USFilter Scaltech. Even though this facility has very few emissions, it is subject to the refinery MACT and is considered a TV facility due to its association with the refinery. See the PART II explanation of the relationship between Sunoco, Inc., TWO LLC and USFilter Scaltech.	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

None			<p>Sunoco, Inc. refinery is the generator of waste streams for which the total annual benzene quality exceeds 10 megagrams per year (11 tons per year), so 40 CFR 61, subpart FF is applicable to the Sunoco refinery. TWO LLC/US Filter and US Filter Scaltech are independent companies which, by contract, are responsible to treat the Sunoco refinery waste streams. Portions of 40 CFR 61, subpart FF are applicable to the operations of both TWO LLS/US Filter and US Filter Scaltech. TWO LLC/US Filter and US Filter Scaltech will be responsible to the extent of their control of the benzene treatment process.</p> <p>The relation of these three firms is described below.</p> <ul style="list-style-type: none"> - Sunoco, Inc., a refinery operating in Lucas County, contracts the treatment of it's wastewater to TWO LLC/US Filter. - TWO LLC/US Filter owns and operates an API oil-water separator and other wastewater treatment equipment which accepts wastewater which originates, at this time, exclusively from the Sunoco related facilities. TWO LLC/US Filter and Sunoco occupy adjacent and separate areas within the refinery boundaries. TWO LLC/US Filter produces treated water and oil which are returned to Sunoco as separate streams; and a mixture of oil, water, and solids ("sludge") which are sent to US Filter Scaltech for further processing. - US Filter Scaltech operates sludge processing equipment as a part of the wastewater treatment process and occupies adjacent separate areas within the refinery boundaries to both TWO LLC/US Filter and Sunoco. US Filter Scaltech receives oil, water and solid mixtures from TWO LLC/US Filter or from Sunoco, exclusively (at this time). US Filter Scaltech separates these waste streams into a water and oil mixture, which is returned to TWO LLC/US Filter, oil which is returned to Sunoco, and a high solids slurry which is loaded into tanker trucks and used as a fuel product.
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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 & 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												
P001	0.73 TPY VOC	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - The annual emission limitations were established for PTI purposes to reflect the potential to emit from all of the equipment comprising this process unit while utilizing a 98% effective VOC control device. Therefore, if adequate monitoring, recordkeeping and reporting requirements are maintained to demonstrate compliance with 98% effective VOC control efficiency requirement, compliance will be also demonstrated with the annual emission limitations.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR 63, subpart CC; 40 CFR 63, subpart A; 40 CFR 61, subpart FF; 40 CFR 60, subpart QQQ; 40 CFR 60, subpart Kb; and OAC rule 21-09(L).</p> <p>ET - compliance is demonstrated through engineering calculations using the latest version of TANKS and US EPA's WATER software for the tanks and water clarifier, with 98% control on the carbon adsorber.</p>
	none		40 CFR 63, subpa rt CC	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - Organic HAPs shall be controlled to the level represented by the equations stated in 40 CFR 63.642(g).</p> <p>The permittee shall also comply with the equipment leak section of subpart CC.</p>
	none		40 CFR 63, subpa rt A	N	N	N	N	N	N	N	N	N	N	N	<p>Basis - the permittee shall comply with the applicable portions of 40 CFR 63 subpart A as specified in Table 6 of 40 CFR 63, subpart CC for wastewater and equipment leaks</p>

	none		40 CFR 61, subpart FF	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - the permittee shall comply with the applicable portions of subpart FF for the following sources: tanks, containers, individual drain systems, oil water separators, treatment processes and closed vent systems and control devices. OR - for treatment of the waste streams, see PART II of this document to see who is responsible for the streams.
	none	21-09 (L)(2) (a)		Y	N	N	N	N	N	N	N	N	N	N	ND - exempt because tank capacity is less than 40,000 gallons
	none	21-09 (M)(2)		Y	N	N	N	N	N	N	N	N	N	N	ND - the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-31-05(A)(3).
	none	21-09 (T)		Y	N	N	N	N	N	N	N	N	N	N	ND - the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 63, subpart CC. Also the permittee shall comply with the VOC leak detection and repair program of this rule by maintaining compliance with the OR, M&R, RP requirements of 40 CFR 63, subpart CC for all VOC equipment leaks.
	none		40 CFR 60 subpart Kb	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt because capacity of storage vessels are less than 75 cubic meters (19,813 gallons).

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.
4. 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.