

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Whirlpool Corporation-Marion Division		
Premise Number	0351010012		
Number of Non-insignificant Emissions Units	20		
What makes this facility a Title V facility?	VOC and HAP's		
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	
N/A			

- **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	Mis c	Comments
		SIP (3745-)	O th er							
B002- B005, B009- B011, N001- N007	20% opacity, as a 6-minute average	17-07 (A)	N	N	Y	Y	Y	N	N	ET - The M/R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
N001- N007	0.10 lb PE/100 lbs of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator	17-09 (B)	N	N	Y	Y	Y	N	N	ET- Testing is required in accordance with Engineering Guide #16.
B002- B005, B009- B011	0.020 lb PE/mmBtu of actual heat input	17-10 (B)	N	Y	Y	Y	Y	N	N	OR- Combust only natural gas and/or #2 fuel oil. ET- Testing in accordance with Engineering Guide #16.
K001, K003, K004, K006, K007, K008	None	17-11								UMRE is less than 10 lb/hr and facility is located in a non-Appendix A area (Marion county), therefore, no state or federally enforceable emissions limitations are established.
B002, B003, B005	1.6 lbs SO ₂ /mmBtu of actual heat input	18-06 (D)	N	Y	Y	Y	Y	N	N	OR- This limit is applicable only when #2 fuel oil is combusted. The quality of oil is required to be such that compliance with the 1.6 lbs SO ₂ /mmBtu limitation can be met. ET- Calculations using sulfur content analysis of the #2 fuel oil will be sufficient to demonstrate compliance.

K008	0.90 kg VOC/liter of applied coating solids based on a volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (equivalent to 7.51 pounds per gallon applied coating solids)	NSPS Subpart SS	N	Y	Y	Y	Y	N	N	ET- This emissions unit was subject to NSPS, Subpart SS requirements prior to the modification in PTI #03-9333 and, as such, the permittee has already completed the initial performance testing requirements of 40 CFR Part 60, Section 60.8.
K008	2.8 lbs VOC/gallon coating, excluding water and exempt solvents	21-09 (K)(1)	N	N	Y	Y	Y	N	N	ET- Calculations based on VOC content and gallon usage are sufficient to show compliance.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = record keeping 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 requirements. 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, record keeping, 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.