

Statement of Basis For Title V Permit

Part I - General

Company Name	Campbell Soup Company
Premise Number	0335010105
What makes this facility a Title V facility?	PE, SO ₂ , CO, NO _x , HCl
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 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.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1		40 CFR, Part 63	States applicability of MACT rule, Subpart DDDDD for emission units B001 and B002.
A.2		40 CFR, Part 63	States applicability of MACT, Subpart A for emission units B001 and B002.
A.3		40 CFR, Part 64	States applicability of CAM rule.
A.4	77-07		Lists insignificant emission units subject to a PTI and/or one or more applicable 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.

Part III (Requirements Within the State and 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	<u>Comments</u>
		SIP (3745-)	Other												

B001, B002, B003, B004	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
B007, B008, B009	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
B001, B002	386.1 lbs HCl/hr (Health Based Compliance Alternative)	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart DDDDD M, R, Rp and ET-Requirements of 40 CFR, Part 63, Subpart DDDDD are not currently effective. The compliance date in the rule is 9/13/07.
P005	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
F001	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

F001	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B007, B008, B009	0.020 lb PE/mmBtu of actual heat input	17-10(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on maximum hourly gas consumption rate, the appropriate emission factor and maximum heat input capacity are sufficient to show compliance.
B001, B002, B003, B004	0.13 lb PE/mmBtu of actual heat input	17-10(C)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P005	20.4 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
B001, B002	6.2 lbs SO2/mmBtu actual heat input	18-41(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation. M and R include records of heat content and sulfur content. A CEM is not economically justified. CAM is not applicable. ET-The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements of this permit (i.e., sulfur content and heat content).
B003, B004	2.1 lbs SO2/mmBtu of actual heat input	18-41(B)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation. M and R include records of heat content, sulfur content and calculated SO ₂ emission rate. A CEM is not economically justified. CAM is not applicable. ET-The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements of this permit (i.e., sulfur content and heat content).

R001, R002	None	21-07(G)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited. M and R include records of use of photochemically reactive materials. A CEM is not economically justified. CAM is not applicable. ET-There are no emissions limitations established pursuant to this rule, therefore, no emissions testing is required.
B007, B008, B009	0.47 lb PE/hr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
B007, B008, B009	2.06 tons PE/yr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B007, B008, B009	6.2 lbs NOx/hr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
B007, B008, B009	27.16 tons NOx/yr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B007, B008, B009	5.2 lbs CO/hr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
B007, B008, B009	22.78 tons CO/yr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

B007, B008, B009	0.34 lb OC/hr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
B007, B008, B009	1.49 tons OC/yr	N	31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
R001	1.52 lbs OC/hr,	N	31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on the maximum hourly adhesive coating usage and the maximum OC content are sufficient to show compliance.
R001	6.66 tons OC/yr	N	31-05	N	N	Y	N	N	Y	N	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B001, B002, B003, B004, B007, B008, B009	See Rule	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart DDDDD M, R, Rp and ET-Requirements of 40 CFR, Part 63, Subpart DDDDD are not currently effective. The compliance date in the rule is 9/13/07.

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.
2. 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.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.

