

# Statement of Basis For Title V Permit

## Part I - General

Company Name	Glen Gery Corporation - Caledonia Plant	
Premise Number	0351000005	
What makes this facility a Title V facility?	SO <sub>2</sub> and HAPs	
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)	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 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)	NO	
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		Comments
	SIP (3745- )	Other	
None			

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	Comments
		SIP (3745- )	Other												
P002, P008	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P901	N/A	17-07(A)	N	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 rule 3745-31-05(A)(3). M, R, Rp & ET-The M, R, Rp and ET that address opacity can be found under the BAT limit for opacity limitation.

P007	Visible PE shall not exceed 20% opacity, as a 6-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, F002, P001, P901	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, F002, P001, P901	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.
P002, P008	Exempt	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P007, P901	N/A	17-11(B)	N	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 rule 3745-31-05(A)(3). M, R, Rp & ET-The M, R, Rp and ET that address the hourly PE can be found under the BAT limit for hourly PE limitation.
P002, P008	129.7 lbs SO <sub>2</sub> /hr	18-06(E)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Combust only natural gas. M and R includes type of fuel, hours of operation, production rate, sulfur content of product and hourly SO <sub>2</sub> emissions. This is an existing unit, therefore, CEMs are not economically justified. CAM is not currently applicable.
P002, P008	Exempt	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart JJJJJ ND-Pursuant to 40 CFR 63.8390, these emission units are exempt from the requirements of this rule because they have a capacity of less than 10 tons/hr.
P007	3.0 lbs PE/hr	N	31-05(A)(3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 3650 hours per year. M & R includes records of hours of operation. This is an existing unit, therefore, CEMs are not economically justified. CAM is not applicable. ET-This is a small emitting source that is well controlled. Initial emissions testing showed compliance with the allowable emission rate. Current M, R and Rp requirements are considered sufficient to ensure ongoing compliance.
P007	5.50 tons PE/yr	N	31-05(A)(3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 3650 hours per year. M & R includes records of hours of operation. This is an existing unit, therefore, CEMs are not economically justified. CAM is not applicable. provide indication of ongoing compliance. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P901	4.06 lbs PE/hr	N	31-05(A)(3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 160,488 tons of brick per year. M & R includes records amount of bricks produced. A CEM is not possible. CAM is not applicable. ET-This is a small emitting source that is well controlled. Initial emissions testing showed compliance with the allowable emission rate. Current M, R and Rp requirements are considered sufficient to ensure ongoing compliance.

P901	13.04 tons PE/yr	N	31-05(A) (3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 160,488 tons of brick per year. M & R includes records amount of bricks produced. A CEM is not possible. CAM is not applicable. provide indication of ongoing compliance. ET-Calculations based on actual brick production, an uncontrolled emission factor of 3.422 lbs/ton, a 95% capture and control efficiency are sufficient to show compliance.
P901	1.37 tons fugitive PE/yr	N	31-05(A) (3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 160,488 tons of brick per year. M & R includes records amount of bricks produced. A CEM is not possible. CAM is not applicable. provide indication of ongoing compliance. ET-Calculations based on actual brick production, an uncontrolled emission factor of 3.422 lbs/ton, a 95% capture efficiency and a 90% control efficiency are sufficient to show compliance.
P901	Visible PE shall not exceed 10% opacity, as a 6-minute average from the baghouse stack.	N	31-05(A) (3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 160,488 tons of brick per year. M & R includes records amount of bricks produced. A CEM is not possible. CAM is not applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P901	Visible fugitive PE shall not exceed 10% opacity from any building opening.	N	31-05(A) (3)	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-Annual restriction of 160,488 tons of brick per year. M & R includes records amount of bricks produced. A CEM is not possible. CAM is not applicable. provide indication of ongoing compliance. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

P002, P008	N/A	N	40 CFR, Part 63, Subp art JJJJ	N	N	N	N	N	N	N	N	N	N	N	ND-Because the capacity of the kilns is less than 10 tons/hr, pursuant to 40 CFR 63.8390, there are no applicable requirements. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
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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.

