

# Statement of Basis For Title V Permit

<b>Part I - General</b>	
Company Name	Tate & Lyle, Dayton
Premise Number	08-57-04-1333
What makes this facility a Title V facility?	Carbon monoxide (CO), Nitrogen oxides (NO) and Sulfur Dioxide (SO2)
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	<b>Y</b>
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.	<b>N</b>
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)	<b>N/A</b>
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)	<b>N/A</b>
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)	<b>N/A</b>
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)	<b>N/A</b>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.2, A.3, A.4, and A.5.		OAC rule 3745-35-07(B)	The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for the entire facility will be required to monitor compliance

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**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												
B001, B002 and B004	The particulate emissions from this emissions unit shall not exceed 0.020 pounds per MM Btu actual heat input.	17-10-(B)(1)		N	N	N	N	N	N	N	N	N	N	N	for No.2 oil M , R, Rp - No. 2 oil is presumed 'inherently clean fuel' ET - No.2 oil normally used only for start-up.

B001 and B002	The sulfur dioxide emissions from this emissions unit shall not exceed 0.8 pounds per MM Btu actual heat input.	18-63(T)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Use compliant fuel M - Tracking of fuel shipment sulfur content and heat value allows for direct mass balance calculations of emissions. ET - Fuel sampling/analysis is compliance method by rule.
B004	The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.	18-06(A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Use compliant coating ET - Fuel sampling/analysis is compliance method by rule.
B001, B002	6.7 tons PE/yr	31-05-(A)(3)	PTI 08-2281	N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none Provided that compliance is shown with the 0.02 lb/mm Btu limitation, compliance will also be shown with the annual limitation.
	271 tons SO2/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none Provided that compliance is shown with the 0.8 lb/mm Btu limitation, compliance will also be shown with the annual limitation.
	0.43 lb OC/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.

	1.9 tons OC/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	10.4 lbs NOx/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	45.5 tons NOx/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	10.9 lbs CO/hr			N	N	N	N	N	N	N	N	N	Y	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	47.74 tons CO/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
B001, B002 and B004	Except as provided by rule, visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.	31-05- (A)(3)		N	N	N	N	N	N	N	N	N	Y	N	M, R, and Rp -none primarily uses 'inherently clean fuel'

B002	The particulate emissions from this emissions unit shall not exceed 0.24 pound per MM Btu actual heat input (when burning recycled used oil).	31-05-(A)(3)		N	N	N	N	N	N	N	N	N	Y	N	for used oil M, R, and Rp -none primarily uses 'inherently clean fuel'
	190 tons SO2/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
B004	6.31 tons PE/yr	31-05-(A)(3)		N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	0.04 lb SO2/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	0.18 ton SO2/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	7.0 lbs NOx/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.

	30.7 tons NOx/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	5.88 lbs CO/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	25.8 tons CO/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	0.77 lb OC/hr			N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	3.38 tons OC/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
P004	0.50 lb PE/hr	31-05- (A)(3)		N	N	N	N	N	N	N	N	N	N	N	M, R , Rp and ET- none The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.
	2.19 tons PE/yr			N	N	N	N	N	N	N	Y	N	N	N	M, R , and ET- none The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, reporting requirements and testing requirements to ensue compliance with this limit.

	Except as provided by rule, visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.			N	N	N	N	N	N	N	N	N	Y	N	M, R, Rp- none The control equipment operational restrictions, monitoring, record keeping and reporting requirements are sufficient to ensure compliance.
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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.