

Statement of Basis For Title V Permit

Part I - General	
Company Name	General Mills Operations, Inc.
Premise Number	1431400175
What makes this facility a Title V facility?	Potential emissions of PM ₁₀ >100 TPY
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)	<p>A number of pieces of equipment were removed from renewal application of the Title V for emissions unit P002. However, the result was that the assigned allowable emissions did not change from the original Title V.</p> <p>A number of pieces of equipment were also removed from renewal application of the Title V for emissions unit P034. In addition, a dust collector was added to this emissions unit. This resulted in assigning new allowable PE/PM₁₀ emissions and deleting the OC permit allowables assigned from the original Title V.</p>

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	77-01(u)		Listing of insignificant emissions units

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												
B002 and B003	0.2 lb CO/MMBTU when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.06 lb CO/MMBTU when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B002 and B003	0.17 lb NOx/MMBT U when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.08 lb NOx/MMBT U when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.02 lb PE/PM10/M MBTU when burning No.2 oil	17-10(B)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.02 lb PE/PM10/M MBTU when burning Natural Gas	17-10(B)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.304 lb SO2/MMBT U when burning No.2 oil	31-05(A)(3)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR-sulfur content and heat content restrictions M-Fuel oil is sampled for heat content and sulfur content R-The heat content, sulfur content, and emission rate is recorded Rp-Deviation Reports are submitted for non-compliance
B002 and B003	0.0006 lb SO2/MMBT U when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	0.0146 lb OC/MMBTU when burning No.2 oil	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

B002 and B003	0.00146 lb OC/MMBTU when burning Natural Gas	31-05(A)(3)		N	N	N	Y	N	N	Y	N	Y	N	N	The lb/MMBtu emission limitations for CO, OC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 37.98 TPY CO	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 37.79 TPY NOx	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 40.54 TPY SO2	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 6.45 TPY PE/PM10	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.
B002 and B003	Combined emissions form B002 and B003 shall not exceed 4.71 TPY OC	31-05(C)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR- The amount and type of fuel are limited to ensure compliance with the TPY limit. M&R-The amount and type of fuel is collected and recorded. Rp-Deviation reports are required. Et-No emission testing is required as compliance is ensured through fuel quantity and quality limitations.

B002 and B003	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.		40 CFR Part 60 Subpart Dc	N	Y	N	N	N	N	N	N	N	N	N	OR: required to utilize inherently clean fuel (natural gas only) ET: Compliance with opacity demonstrated by use of inherently clean fuel and fuel type record keeping requirements. No visible emission testing unless a problem is identified with the emission unit.
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
P002	2.49 lbs/Hr and 10.9 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.
P029	2.21 lbs/Hr and 9.7 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.
P34	3.42 lbs/Hr and 15.2 TPY PE/PM10	31-05(C)(3)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. Rp-Deviation reports are required to identify problems with the baghouse.

P002, P029, P034	20 % Opacity	17-07(A)		N	N	Y	Y	N	Y	Y	Y	Y	N	N	M&R-The pressure drop across the baghouse controlling this emission unit is monitored to ensure the control device is functioning properly. This ensures compliance with the visible emission limitation. Rp-Deviation reports are required to identify problems with the baghouse.

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.

C **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.