

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Cargill, Inc.		
Premise Number	0575010160		
Number of Non-insignificant Emissions Units	29		
What makes this facility a Title V facility?	VOC, NOx, SO2, PM		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y		

<b>Part II (State and Federally Enforceable Requirements)</b>			
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	Misc	Comments
		SIP (3745- )	Other							
B001 B002	0.24 lb PE/mmBT U	3745-17- 10	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M - operation and maintenance program and pressure drop monitor R - records of inspections, pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years after issuance and 1 year before renewal
B001 B002	3.6 lbs SO2/mmB TU	3745-18- 81	N	N	Y	Y	Y	Y	N	M - coal analysis R - coal received, analysis results and calculated SO2 mission rate Rp - quarterly coal analysis reports ET - within 1.5 years after issuance and 1 year before renewal
B001 B002 P007 P008 P009 P011 P015 P016 P024 P032 P033	20% opacity as 6-minute average	3745-17- 07	N	Y	Y	Y	Y	N	N	OR - maintain pressure drop across baghouse M - operation and maintenance program and pressure drop monitor, daily opacity checks R - records of inspections, pressure drop readings, opacity log Rp - pressure drop deviation reports, opacity deviation reports
B005 B006	0.02 lb PE/mmBT U	3745-17- 10	N	Y	N	Y	Y	N	N	OR - burn only natural gas R - record of any fuel other than natural gas Rp - deviation report when other fuels are burned
B005 B006	20% opacity as 6-minute average	3745-17- 07	N	Y	N	N	N	N	N	OR - burn only natural gas
P004 P005	0% opacity	N	40 CFR Part 60 Subpa rt DD	Y	Y	Y	Y	N	N	OR - maintain pressure drop across baghouse M -pressure drop monitor, daily opacity checks R - pressure drop readings, opacity log Rp - pressure drop deviation reports, opacity deviation reports
P004 P024	57.4 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal

P005	70.6 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal
P006 P034	0% opacity	N	40 CFR Part 60 Subpa rt DD	N	Y	Y	Y	N	N	M -daily opacity checks R - opacity log Rp - opacity deviation reports
P006	57.37 lbs PE/hr	3745-17- 11	N	N	N	Y	N	Y	N	R - quantity of grain processed, hours of operation ET - if required
P007 P009 P032 P033	53.3 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal
P008	0.36 lb PE/ton of soybeans processed	3745-17- 11	N	Y	Y	Y	Y	N	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings, quantity of grain Rp - pressure drop deviation reports
P010 P012 P030	20% opacity as 6-minute average	3745-17- 07	N	N	Y	Y	Y	N	M	M -daily opacity checks R - opacity log Rp - opacity deviation reports
P010 P012	52.5 lbs PE/hr	3745-17- 11	N	N	N	N	N	Y	N	ET - within 1.5 years of issuance and 1 year prior to renewal
P011	29.2 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal
P015	50.3 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal
P016	58.5 lbs PE/hr	3745-17- 11	N	Y	Y	Y	Y	Y	N	OR - maintain pressure drop across baghouse M -pressure drop monitor R - pressure drop readings Rp - pressure drop deviation reports ET - within 1.5 years of issuance and 1 year prior to renewal

P018 P031	Non-PCR materials	3745-21-07(G)	N	Y	N	Y	Y	N	N	OR - Non-PCR materials R - documentation of Non-PCR status Rp - Non-PCR deviation reports
P030	53.3 lbs PE/hr	3745-17-11	N	N	N	N	N	Y	N	ET - within 1.5 years of issuance and 1 year prior to renewal
P034	53.1 lbs PE/hr	3745-17-11	N	N	N	N	N	Y	N	ET - required
P901 P902 P903 P904	20% opacity as 3-minute average	3745-17-07(B)(1)	N	N	Y	Y	Y	N	N	M -daily opacity checks R - opacity log Rp - opacity deviation reports
P901 P902 P903 P904	RACM	3745-17-08(B)	N	N	N	N	N	N	N	N/A
T002 T003	N/A - exempt	3745-21-09(L)	N	N	N	N	N	N	N	N/A
T002 T003	N/A	N	40 CFR Part 60 Subpart Kb	Y	N	Y	Y	N	N	OR - vapor pressure less than 27.6 kPa R - dimension and capacity of storage vessel, liquid stored, period of storage, vapor pressure during storage Rp - vapor pressure exceedance deviation report
Z001	no visible emissions	3745-17-07(B)(4)	N	N	Y	Y	Y	N	N	M- daily inspections R - reason inspection not performed, date when determined necessary to implement control measures, dates control measures implemented, operator, number of days implemented Rp - deviation reports - days inspections not done, days when control measures determined necessary and not implemented
Z001	RACM	3745-17-08(B)(8) &(9)	N	N	Y	Y	Y	N	N	M- daily inspections R - reason inspection not performed, date when determined necessary to implement control measures, dates control measures implemented, operator, number of days implemented Rp - deviation reports - days inspections not done, days when control measures determined necessary and not implemented

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping 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, recordkeeping, 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.