Statement of Basis For Title V Permit

Company Name	Carmeuse Lime - Maple Grove Facility
Premise Number	0374000010

What makes this facility a Title V facility?	Particulate, NOx, SO2, CO
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.	EUs with multiple baghouses (baghouse ID): P902 (D131 & D135) P903 (D138 & D139) P905 (D188 & D189) PE limitations from each of the above sources were summations of the emissions from both baghouses. Emissions were established based on the maximum outlet grain loadings and volumetric air flow rates of each baghouse.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
F003 - A.I.2.d.		40 CFR 60, Sub OOO	NSPS, Subpart OOO requires emission point-specific opacities.

- **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 & 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												
F001	5.70 tons PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	M: Fugitive visible emission checks serve to indicate ongoing compliance with limit. A negative observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. CAMs not applicable to fugitive emissions. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings.
	1.14 tons PM10/yr			N	N	Y	N	N	Y	N	Y	N	N	N	
	No VE, except for one min during any 60-mins (paved)			N	N	Y	N	N	Y	N	Y	N	N	N	
	No VE, except for 3-mins during any 60-mins (unpaved)			N	N	Y	N	N	Y	N	Y	N	N	N	
	BACM to minimize/ eliminate VE of fugitive dust			N	N	Y	N	N	Y	N	Y	N	N	N	

F002/ Z004	0.61 ton PE/yr 0.40 ton PM10/yr No VE, except for one min during any 60-mins (load-in, load-out, and wind erosion) BACM to minimize/ eliminate VE of fugitive dust	31-05 (A)(3)		N N N N	N N N N	Y Y Y Y	N N N N	N N N N	Y Y Y Y	N N N N	Y Y Y Y	N N N N	N N N N	N N N N	M: Fugitive visible emission checks serve to indicate ongoing compliance with limit. A negative observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. CAMs not applicable to fugitive emissions. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings.
F003	4.34 tons PE/yr 2.10 tons PM10/yr BACM to minimize/ eliminate VE of fugitive dust	31-05 (A)(3)		N N N	N N N	Y Y Y	N N N	N N N	Y Y Y	N N N	Y Y Y	N N N	N N N	N N N	M: Daily inspections of the material handling operations that are not adequately enclosed and fugitive VE checks of the enclosed transfer points serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings.

P001	1.05 lbs PE/hr	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings, and/or Method 5 stack testing.
	4.60 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
P002	1.38 lbs PE/hr	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings, and/or PE stack testing.
	6.04 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	

P003 P004	14.23 lbs PE/hr	31-05 (A)(3)		N	N	Y	N	N	N	N	Y	N	Y	N	OR: Permittee shall burn coal with a maximum sulfur content not to exceed 5.50 %, by wt, coke with a maximum sulfur content not to exceed 6.50%, by wt, and natural gas. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: (PE, opacity) These limitations were based on "worst case" scenarios using company supplied emission factors and maximum throughput. COM indicates ongoing compliance with the PE limitations and opacity restriction. Compliance will also be demonstrated through the stack testing requirements. (SO2*) These limitations were based on "worst case" scenarios using company supplied emission factors and maximum throughput. Grab samples and/or supplier data of each shipment of coal and coke that is received by the company provides indication of compliance with SO2 limitations. Compliance will also be demonstrated through the stack testing requirements. (NOx*, CO*, VOC, Pb) These limitations were based on "worst case" scenarios using company supplied emission factors and maximum throughput. No M & R requirements were established. Emission testing will verify compliance. (* See Misc. comments) ET: (opacity) The data from the COM is sufficient to demonstrate compliance with the opacity restriction without requiring formal Method 9 readings. Misc: (NOx & CO) The company supplied emission factors for these pollutants were incorrect, and the company is certifying noncompliance for this emissions unit. Updated modeling, BACT analysis, and EAC forms have been submitted to correct this permitting deficiency.
	62.33 tons PE/yr			N	N	Y	N	N	N	N	Y	N	NA	N	
	0.021 gr PE/dscf			N	N	Y	N	N	N	N	Y	N	Y	Y	
	541.68 lbs NOx/hr			N	N	N	N	N	N	N	Y	N	Y	Y	
	2372.56 tons NOx/yr			N	N	N	N	N	N	N	Y	N	NA	N	
	330.70 lbs SO2/hr			N	Y	Y	N	N	Y	N	Y	N	Y	N	
	1448.46 tons SO2/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	270.83 lbs CO/hr			N	N	N	N	N	N	N	Y	N	Y	Y	
	1186.23 tons CO/yr			N	N	N	N	N	N	N	Y	N	NA	Y	
	16.25 lbs VOC/hr			N	N	N	N	N	N	N	Y	N	Y	N	
	71.17 tons VOC/yr			N	N	N	N	N	N	N	Y	N	NA	N	
	0.005 lb Pb/hr			N	N	N	N	N	N	N	Y	N	Y	N	
	0.02 tons Pb/yr			N	N	N	N	N	N	N	Y	N	NA	N	
	15% opacity as 6-min avg.			N	N	Y	N	N	Y	N	Y	N	N	N	

P901	0.62 ton fug PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points and crushing operation serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings, and/or PE stack testing.
	0.31 ton fug PM10/yr			N	N	Y	N	N	Y	N	Y	N	NA	N	
	0.89 lb PE/hr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	3.90 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	

P902	0.63 ton fug PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points and crushing operation and the partially enclosed transfer points and screening operations serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings and/or PE stack testing.
	0.30 ton fug PM10/yr			N	N	Y	N	N	Y	N	Y	N	NA	N	
	1.77 lbs PE/hr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	7.75 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
	10% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	

P903	0.63 ton fug PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points and crushing operation and the partially enclosed transfer points and screening operations serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings and/or PE stack testing.
	0.30 ton fug PM10/yr			N	N	Y	N	N	Y	N	Y	N	NA	N	
	0.62 lb PE/hr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	2.72 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
	10% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	

P904	2.40 tons fug PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points and crushing operation and the partially enclosed transfer points and loading operations serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings and/or PE stack testing.
	1.13 tons fug PM10/yr			N	N	Y	N	N	Y	N	Y	N	NA	N	
	1.30 lbs PE/hr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	5.69 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
	10% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	

P905	0.50 ton fug PE/yr	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	OR: Baghouse PD shall remain between the rage of 5-8" water. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: Daily pressure drop monitoring on the baghouse provides indication of ongoing PM control and compliance with the opacity limit. Daily fugitive VE checks of the enclosed transfer points and crushing operation and the partially enclosed transfer points and loading operations serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings, Method 9 readings and/or PE stack testing.
	0.21 ton fug PM10/yr			N	N	Y	N	N	Y	N	Y	N	NA	N	
	0.24 lb PE/hr			N	Y	Y	N	N	Y	N	Y	N	N	N	
	1.05 tons PE/yr			N	Y	Y	N	N	Y	N	Y	N	NA	N	
	0.01 gr PE/dscf			N	Y	Y	N	N	Y	N	Y	N	N	N	
	no VE from building enclosures			N	N	Y	N	N	Y	N	Y	N	N	N	
	7% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
	10% opacity from stack			N	Y	Y	N	N	Y	N	Y	N	N	N	
F001 F002 F003 P001 P002 P003 P004 P901 P902 P903 P904 P905	The permittee shall employ BACT see comments	40 CFR 52.21 & 31-10 through 31-20													In accordance with this rule, the company submitted a BACT Analysis which addressed the Best Available Control Technology for each emissions unit. Appropriate OR, M, R, and Rp requirements have been established to verify that the company is employing these controls.

P001 P002 P003 P004 P901 P902 P903 P904 P905		17-07 (A)		Y											The emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).
F001 F002 F003 P901 P902 P903 P904 P905		17-07 (B)		Y											This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (B) pursuant to OAC rule 3745-17-07 (B)(11)(e).
F001 F002 F003 P901 P902 P903 P904 P905		17-08 (A)		Y											Carmeuse Lime - Maple Grove Facility is not located within an “Appendix A” area, as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08 (A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B)(1)
P001 P002 P003 P004 P901 P902 P903 P904 P905		17-11 (B)		Y											The emission limitations specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05 (A)(3).

P003 P004	The permittee shall not cause or permit the emission of SO2 to exceed a maximum of 34.0 lbs of SO2 per ton of actual process weight input.	18-80 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: Permittee shall burn coal with a maximum sulfur content not to exceed 5.50 %, by wt, coke with a maximum sulfur content not to exceed 6.50%, by wt, and natural gas. M, R & Rp requirements will verify compliance with this restriction. CAM is not feasible. M: These limitations were based on "worst case" scenarios using company supplied emission factors and maximum throughput. Grab samples and/or supplier data of each shipment of coal and coke that is received by the company provides indication of compliance with SO2 limitations. Compliance will also be demonstrated through the stack testing requirements.
F003	no VE from building enclosures 10% opacity from transfer points an d screening operations		NSPS Sub. OOO	N	N	Y	N	N	Y	N	Y	N	N	N	M: Daily inspections of the material handling operations that are not adequately enclosed and fugitive VE checks of the enclosed transfer points serve to indicate compliance with the fugitive opacity restriction. ET: The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings.

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

- **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 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.
  4. 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.