

## Statement of Basis For Title V Permit

Company Name	Countywide Disposal and Recycling Facility	
Premise Number	15-76-00-1579	
Number of Non-insignificant Emissions Units	4	
What makes this facility a Title V facility?	NMOC emissions are greater than 100 TPY	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
Not Applicable - There are no applicable requirements to which these insignificant Emissions Units are subject.			

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
F001	None									
F002	See A.I.2.2.a through c below.  a - The active collection system shall satisfy the following requirements, etc., etc.	N	Y	Y	Y	Y	Y	Y	N	Y for other. NSPS WWW. Y for OR. Operate collection system in areas of certain MSW ages (A.II.1). CAM is not applicable. M and R specified in A.III.8. Rp specified in A.IV.6 and .7. CAM is not applicable. Y for OR. A.II.1 (operate collection system in areas of MSW of certain ages) A.II.2. (wellhead pressure), A.II.3. (wellhead temp.), A.II.4. (500 ppm methane), and A.II.5. (All vented to control system). M and R. A.III.1, A.III.2, A.III.3, A.III.4, and A.III.8. Rp. A.IV.1, A.IV.5, A.IV.6, and A.IV.7.
F002	b. - The collected gas shall be vented to an open flare designed etc., etc. See the following VE limitation also.	N	Y	Y	Y	Y	Y	Y	N	Y for other. NSPS WWW. Y for OR. A.II.5. (all collected gases to a control system), A.II.6. (operate the flare when gas is vented to it), A.II.7. (Pilot flame at all times in the flare burner.) M and R specified in A.III.3., A.III.4., A.III.5., and A.III.6. Rp specified in A.IV.1, A.IV.5 and A.IV.6. CAM is not applicable.
F002	b. - There shall be no visible emissions from the flare except for periods of time not to exceed a total of 5 minutes during any consecutive 2 hours	N	Y	N	Y	Y	Y	Y	N	Y for other. 40CFR 60.18, General requirements for as Flare. N for OR. No OR is needed for a VE limit. M. Monitoring is specified in A.V.2, initial performance test. N for Misc. No Misc. T&C's are needed.
F002	c. - The collection and control system may be capped or removed etc., etc.	N	Y	N	N	Y	Y	Y	N	Y for other. NSPS WWW. N for OR, M, and Misc. No T&C's are needed.
F004		None								
F005		None								

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

In Part III of emissions unit F002, section A. (V.) (2.) (a.), the NSPS 60.8 Performance Test Requirements, it is stated that the Administrator has approved the use of an equivalent method. Because the NSPS WWW does not explicitly specify the initial performance test requirements, and because it is not practical to measure the pollutant levels at the output of an open flare, based upon consultation with the USEPA Region V staff, the method for the initial performance test was established.

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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.

- 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.

- **Instructions for Part III:**

- All non-insignificant EU’s must be included in this table. For each EU, or group of similar EU’S, 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 each column where “N” is specified, there should be a brief explanation in the “Comments” section. 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.
- 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.