

## Statement of Basis For Title V Permit

Company Name	MM Cuyahoga Energy LLC	
Premise Number	13-18-53-8151	
What makes this facility a Title V facility?	CO emissions	
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.	No	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.a - f	31-05		Facility emissions shall not exceed: 26.44 tpy SO <sub>2</sub> ; 51.84 tpy NO <sub>x</sub> ; 138.04 tpy CO; 15.24 tpy NMOC; and 9.84 tpy PE.
A.2	31-05		Internal combustion engine(s) shall operate at all times when the landfill gas is routed to the internal combustion engine(s).
A.2.a	31-05		Total heating value of landfill gas burned in all four (4) engines shall not exceed 36.24 MM Btu per hour.
A.2.b	31-05		All emission units shall be designed and operated in such a manner that the requirements of OAC rule 3745-76 for municipal solid waste landfill controls are satisfied.
A.2.c	31-05		In the event that the gas collection system or the engines are inoperable, all valves which vent landfill gas to the atmosphere shall be closed.
A.3.a - b	31-05		Calibration and operation of the monitoring equipment associated with the internal combustion engine shall be maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
A.3.c	31-05		If the bypass line valve to emissions units P001 - P004 is closed, the valve shall be held in the closed position with a car-seal or a lock-and-key type configuration...to ensure that the gas flow is not diverted through the bypass line.

A.3.d	31-05		Maintain records of the dates and times the gas collection system becomes inoperable, bypass line valve closure, and records of the maintenance performed to restore normal operation.
A.3.e	31-05		Maintain hourly records of the gas flow rate, heating value of the landfill gas, and the total heating value of the landfill gas.
A.4 - A.4.a	31-05		Submit quarterly deviation reports for the heating value of the landfill gas and when the gas collection system was inoperable.
A.5	N	N	The landfill site, and the gas collection system serving these four (4) internal combustion engines are owned and administered by two separate and independent companies. A third independent company owns, and operate the four (4) internal combustion engines being permitted under this Title V action.

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 & 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		N D	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
P001 P002 P003 P004	SO <sub>2</sub> : 1.51 lbs/hr; 6.61 tons/yr  NO <sub>x</sub> :: 2.96 lbs/hr; 12.96 tons/yr  CO: 7.88 lbs/hr; 34.51 tons/yr  NMOC: 0.87 lbs/hr; 3.81 tons/yr	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The emissions unit shall be operated with a solenoid valve at the inlet to the emissions unit that completely shuts off gas flow to the emissions unit when the emissions unit is not operating. This is needed to ensure that NMOC emissions do not escape uncontrolled.  ET - Facility performed a stack test for SO <sub>2</sub> , NO <sub>x</sub> , CO, and NMOC in May of 1999 to demonstrate compliance. The emission factors developed from that test are used to demonstrate compliance.
P001 P002 P003 P004	not exceed 20% opacity, as a 6-minute average	17-07 (A)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	ET - No testing is needed since there is a daily visible emissions check required under the monitoring section including record keeping and reporting of visible emissions incidents.
P001 P002 P003 P004	PE shall not exceed 0.062 pounds per MM Btu actual heat input	17-11 (B)(5)( b)		N	N	Y	N	N	Y	N	Y	N	N	N	ET - Facility performed a stack test for particulates in May of 1999 to demonstrate compliance. The emission factor developed from that test is used to demonstrate compliance.
P001 P002 P003 P004	No limit.	18-06(G)		N	N	N	N	N	N	N	N	N	N	N	No emission limit from this rule since the unit is exempt pursuant to OAC rule 3745-18-06(B).

P001 P002 P003 P004	No emission limit	21-08(B)		N	N	Y	N	N	Y	N	Y	N	N	N	Satisfied the “best available control techniques and operating practices” through the BAT requirements of PTI #13-3400.  ET - there is no limit from this rule, therefore, no stack testing needed.
P001 P002 P003 P004	No emission limit	23-06(B)		N	N	Y	N	N	Y	N	Y	N	N	N	Satisfied the “latest available control techniques and operating practices” through the BAT requirements of PTI #13-3400.  ET - there is no limit from this rule, therefore, no stack testing needed.
P001 P002 P003 P004	Each emissions unit shall reduce NMOC by 98 percent by weight or reduce the outlet concentration to less than 20 PPMV (dry basis) as hexane, at 3 percent oxygen.			N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The emissions unit shall be operated with a solenoid valve at the inlet to the emissions unit that completely shuts off gas flow to the emissions unit when the emissions unit is not operating. This is needed to ensure that NMOC emissions do not escape uncontrolled.

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.
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.