

# Statement of Basis For Title V Permit

Company Name	The Scotts Company		
Premise Number	01-80-01-0008		
Number of Non-insignificant Emissions Units	57		
What makes this facility a Title V facility?	Particulate emissions > 100 tons/yr		
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	

**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.

C 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							
P014, P015, P016, P017, P018, P032, P036 through P052, P102 through P113, P133, P134, P138, P140, P141	20% opacity, as a 6 minute average	17-07(A)		N	Y	Y	Y	N	N	ET: If required, US EPA Method 9 as specified by 40 CFR Part 60, Appendix A.
P014, P022 through P031.	No visible emissions from stack.	31-05 (A)(3)		N	Y	Y	Y	N	N	ET: If required, US EPA Method 22 as specified by 40 CFR Part 60, Appendix A.
P013	PE shall not exceed 0.4 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P014	PE shall not exceed 0.02 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P015	PE shall not exceed 1.86 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee must maintain moisture content sufficient to meet particulate limitations.
P016	PE shall not exceed 0.2 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P017	PE shall not exceed 0.10 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P018	PE shall not exceed 0.05 lb.hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.

P019	PE shall not exceed 0.05 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	Y	Y	OR: Permittee shall operate baghouse at all times.
P019,	OC shall not exceed 0.0012 lb/hr.	31-05 (A)(3)		N	N	N	N	Y	N	M/R/Rp: Emissions based on calculations without controls.
P020	OC shall not exceed 1.3 lb/hr and 6.0 tons per year	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber at all times; activated carbon of adsorber must be replaced within 5 days whenever outlet gas concentration exceeds 80% of the permitted limit.
P022	PE shall not exceed 0.04 lb/hr and 0.13 ton/yr. The baghouse shall achieve an outlet of 0.006 gr/scf of PE and PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate bin vent at all times; permittee shall maintain a partial enclosure of the conveyor and elevator; maximum annual operating hours of 7,320. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P022	Fugitive emissions shall not exceed 2.5 lb/hr and 1.3 ton/yr PE; 1.45 lbs/hr and 0.75 ton/yr PM10	31-05 (A)(3)		N	Y	Y	Y	N	N	ET: Compliance determined through emissions calculations using emission factor and maximum production rate. If required, Method 1-5 testing.

P023	PE shall not exceed 0.27 lb/hr and 1 ton/yr, PM10 emissions shall not exceed 0.44 lb/hr and 1.62 ton/yr. Baghouse (FF) shall achieve outlet no greater than 0.002 gr/scf PE and 0.003 gr/scf PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5 inches water; maximum annual operating hours of 7,320. ET: Emissions testing conducted April 25, May 11 and May 12, 1995 (in compliance).
P024	PE and PM10 emissions shall not exceed 0.05 lb/yr and 0.19 tpy; FF outlet no greater than 0.001 gr/scf for PE and PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5 inches water; ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P025	PE shall not exceed 0.31 lb/hr and 1.15 tpy; PM10 shall not exceed 0.15 lb/hr and 0.54 tpy; scrubber outlet no greater than 0.02 gr/scf PE and 0.007 gr/scf PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate scrubber at all times; scrubber flow rate shall be maintained at not less than 110 gallons/minute; maximum annual operating hours not to exceed 7,320. ET: Emissions testing conducted April 25, and May 11, 1995 (in compliance).

P026	PE shall not exceed 1.34 lb/hr and 4.9 tpy; PM10 shall not exceed 1.97 lb/hr and 7.21 tpy; cyclone outlet no greater than 0.007 gr/scf PE and 0.009 gr/scf PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate cyclone at all times; maximum annual operating hours not to exceed 7,320. ET: Emissions testing conducted April 23 and 25, 1995 (in compliance).
P027	PE and PM10 shall not exceed 0.04 lb/hr and 0.13 tpy; FF outlet no greater than 0.006 gr/scf PE and PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5.0 inches water; maximum annual operating hours not to exceed 7,320. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P027	Fugitive emissions shall not exceed 2.5 lb/hr and 1.3 ton/yr PE; 1.45 lbs/hr and 0.75 ton/yr PM10	31-05 (A)(3)		N	Y	Y	Y	N	N	ET: Compliance determined through emissions calculations using emission factor and maximum production rate. If required, Method 1-5 testing.
P028	PE shall not exceed 0.46 lb/hr and 0.63 tpy; PM10 shall not exceed 1.24 lb/hr and 1.7 tpy; FF outlet no greater than 0.003 gr/scf PE and 0.008 gr/scf PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5 inches water; maximum annual operating hours of 2,745. ET: Emissions testing conducted April 26, May 12 and May 23, 1995 (in compliance).

P029	PE and PM10 shall not exceed 0.05 lb/hr and 0.19 tpy; FF outlet no greater than 0.006 gr/scf PE and PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5.0 inches water; maximum operating hours of 7,320. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P031	PE shall not exceed 0.52 lb/hr and 1.9 tpy; PM10 shall not exceed 1.01 lb/hr and 3.7 tpy; FF outlet no greater than 0.004 gr/scf PE and 0.007 gr/scf PM10.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5 inches water; maximum annual operating hours of 7,320. ET: Emissions testing conducted May 18 and 19, 1995 (in compliance).
P032	PE shall not exceed 0.4 lb/hr.	31-05 (A)(3)		N	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber at all times; the average OC concentration for any 3- hour block of time shall not exceed 20% of average of most recent stack test (to be conducted).
P032	OC shall not exceed 3 lbs/hr and 15 lbs/day	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate carbon adsorber at all times; maintain a continuous VOC monitor. ET: Compliance determined through emissions calculations using emission factor, and control efficiency of carbon adsorber. If required, Method 18, 25, and/or 25A testing.
P033	PE and PM10 shall not exceed 0.49 lb/hr and 1.8 ton/yr. Cyclone outlet no greater than 0.025 grain/scf.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate cyclone at all times emission unit is in operation; maximum annual operating hours not to exceed 7,320. ET: Based on emissions calculations and guaranteed efficiency of cyclone.

P036	PE shall not exceed 3.5 lb/hr and 15.3 tpy; PM10 shall not exceed 2.6 lb/hr and 11.4 tpy.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P040	NOx shall not exceed 0.09 lb/hr and 0.4 tpy.	31-05 (A)(3)		Y	N	N	N	N	N	OR: Permittee shall only burn natural gas or LPG. ET: Compliance determined by AP-42 emission factor and maximum gas usage.
P040	CO shall not exceed 0.07 lb/hr and 0.31 tpy.	31-05 (A)(3)		Y	N	N	N	N	N	OR: Permittee shall only burn natural gas or LPG. ET: Compliance determined by AP-42 emission factor and maximum gas usage.
P036, P041, P042, P049, P050, P051, P052	No visible fugitive emissions from the building housing the unit.	31-05 (A)(3)		N	Y	Y	Y	N	N	ET: If required, US EPA Method 22 as specified by 40 CFR Part 60, Appendix A.
P037	PE and PM10 shall not exceed 0.15 lb/hr and 0.65 tpy	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate wet scrubber at all times; water flow rate not less than 110 gallons/minute. ET: Emission testing conducted on this emission unit May 19 and 20, 1999. (in compliance).
P037, P038	NH3 shall not exceed 20.3 lb/hr.	31-05(D)		N	N	N	N	Y	N	
P038	PE and PM10 shall not exceed 0.15 lb/hr and 0.65 tpy.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate wet scrubber at all times; water flow rate not less than 110 gallons/minute. ET: Emission testing conducted on this emission unit May 19 and 20, 1999. (in compliance).

P040	PE and PM10 shall not exceed 3.03 lb/hr and 13.3 tpy. Baghouse outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P040	NH3 shall not exceed 20.0 lb/hr.	31-05(D)		N	N	N	N	N	N	ET: Emission testing conducted on this emission unit in 1999 (in compliance).
P041	PE and PM10 shall not exceed 0.51 lb/hr and 2.2 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P042, P051	PE and PM10 shall not exceed 0.51 lb/hr and 2.2 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times. ET: Emissions testing conducted May 19 and 20, 1995 for P042 (in compliance).
P042, P052	OC shall not exceed 1.5 lb/hr and 6.6 tpy for P042, P052 and P053 combined	31-05 (A)(3)		N	N	N	N	N	N	Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.

P044	PE shall not exceed 1.4 lb/hr and 6.1 tpy. PM10 shall not exceed 1.1 lb/hr and 4.6 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P045	PE shall not exceed 1.0 lb/hr and 4.4 tpy. PM10 shall not exceed 0.9 lb/hr and 3.9 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P046	PE shall not exceed 0.25 lb/hr and 1.1 tpy. PM10 shall not exceed 0.19 lb/hr and 0.8 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P047, P048	PE and PM10 shall not exceed 0.22 lb/hr and 0.96 tpy. Scrubber outlet no greater than 0.01 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate scrubber at all times; water flow not less than 110 gallons per minute.

P049	PE and PM10 shall not exceed 3.03 lb/hr and 13.3 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P050	PE shall not exceed 0.51 lb/hr and 2.25 tpy. PM10 shall not exceed 0.38 lb/hr and 1.67 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P051	PE and PM10 shall not exceed 0.51 lb/hr and 2.2 tpy. FF outlet no greater than 0.005 gr/scf PE.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times.
P067, P068	OC shall not exceed 1.3 lb/hr and 6.0 ton/yr	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber; activated carbon must be replaced within 5 days of outlet gas exceeding 80% of permitted limit.
P067, P068, P069, P070	OC shall not exceed 40 lb/day	21-07 (G)(2)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber; activated carbon must be replaced within 5 days of outlet gas exceeding 80% of permitted limit.
P067	PE shall not exceed 0.1 lb/hr and 0.6 ton/yr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times; pressure drop shall be maintained within range of 0.5 to 5 inches water.

P069, P070	OC shall not exceed 0.9 lb/hr and 4.0 tons/yr	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber; activated carbon must be replaced within 5 days of outlet gas exceeding 80% of permitted limit.
P071	PE shall not exceed 1.1 lb/hr and 4.8 ton/yr and PM10 shall not exceed 0.8 lb/hr and 3.5 ton/yr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation.
P071	PE from baghouse not to exceed 0.0005 grain/scf	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation.
P102	PE shall not exceed 2.58 lb/hr.	17-11(B) Table I		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P103	PE shall not exceed 2.91 lb/hr.	17-11(B) Table I		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Compliance determined through emissions calculations using emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P104	PE shall not exceed 2.91 lb/hr.	17-11(B) Table I		Y	Y	Y	Y	N	N	OR: Permittee shall operate scrubber at all times the emission unit is in operation; water flow rate less than 110 gal/min. ET: Compliance determined through emissions calculations using RACM emission factor, maximum production rate and control efficiency of scrubber. If required, Method 1-5 testing.
P105	PE shall not exceed 3.38 lb/hr.	17-11(B) Table I		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Compliance determined through emissions calculations using RACM emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P106	OC shall not exceed 0.9 lb/hr and 4.0 tons/yr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate carbon adsorber; activated carbon must be replaced within 5 days of outlet gas exceeding 80% of permitted limit.

P109, P115	OC shall not exceed 3 lb/hr and 15 lbs/day	21-07 (G)(2)		N	N	N	N	Y	N	ET: Method 18, 25, or 25A emissions testing.
P109, P110, P111, P113, P115, P131, P132, P133	PE shall not exceed 10 lb/hr	17-11(B) Figure II		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation; ET: Compliance determined through emissions calculations using RACM emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P134	PE shall not exceed 6.52 lb/hr.	17-11(B) Table I		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Compliance determined through emissions calculations using RACM emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
P138	PE shall not exceed 2.5 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Emission testing conducted in 1994 (in compliance).
P139	PE shall not exceed 0.03 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation.
P140	PE shall not exceed 0.6 lb/hr and 2.63 tpy.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation; pressure drop shall be maintained within range of 0.5 to 5.0 inches water; maximum production not to exceed 40,620 lbs/hr. ET: Emission testing conducted May 7, 1994 (in compliance).
P141	PE shall not exceed 0.06 lb/hr.	31-05 (A)(3)		Y	Y	Y	Y	N	N	OR: Permittee shall operate baghouse at all times the emission unit is in operation. ET: Compliance determined through emissions calculations using RACM emission factor, maximum production rate and control efficiency of baghouse. If required, Method 1-5 testing.
T012	OC shall not exceed 0.19 ton/yr.	31-05 (A)(3)		Y	N	Y	N	N	N	OR: Tank shall employ submerged fill. R: Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing its capacity for the life of the vessel. ET: Total OC emissions determined using most recent version of US EPA's "Tanks" program.

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

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 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.

C 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.