

Statement of Basis For Title V Permit

Company Name	Tomen Agro, Inc.	
Premise Number	02-43-12-0034	
Number of Non-insignificant Emissions Units	12	
What makes this facility a Title V facility?	PTE of a single HAP is greater than 10 TPY, facility subject to HON MACT	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1. through A.34., A.43., A.45.	N	Y	40 CFR, Part 63, Subparts A, F, G, H, and I
A.35. through A.42., A.47. through A.54.	Y	N	OAC rule 3745-21-09(DD)
A.44., A.46., A.55.	N	Y	40 CFR, Part 63, Subpart MMM
A.56.	Y	N	OAC rules 3745-20 and 25
A.57.	N	Y	40 CFR, Part 68, Section 112 (r)

- **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							
P001	none									
P002	4.34 TPY of hydrogen halides and halogens	Y		N	N	N	N	N	N	No M, R, Rp, or ET necessary because compliance is assumed as long as compliance with the 98% reduction is demonstrated.
P002	5.7 lbs/hr SO2	Y		N	N	N	N	Y	N	No M, R, or Rp necessary as company is required to stack test to determine compliance.
P002	1 lb.hr of OC or HAPs (10 lbs/hr of OC or HAPs during startup and 4.4 TPY of total OC or HAPs including startup emissions)	Y		Y	Y	Y	Y	Y	N	pH, caustic level, and liquid-to-gas ratio restrictions for scrubber and temperature restriction for incinerator
P002	0.42 lb of PM/hr, 2 TPY	Y		Y	Y	Y	Y	N	N	pH, caustic level, and liquid-to-gas ratio restrictions for scrubber and temperature restriction for incinerator
P002	98 % reduction of organic HAPs or 20 PPM whichever is less stringent	Y		Y	Y	Y	Y	Y	N	pH, caustic level, and liquid-to-gas ratio restrictions for scrubber and temperature restriction for incinerator
P002	99 % reduction of hydrogen halides and halogens or 0.45 kg/hr	Y		Y	Y	Y	Y	Y	N	pH, caustic level, and liquid-to-gas ratio restrictions for scrubber and temperature restriction for incinerator
P002	1 lb of OC/hr	Y		Y	Y	Y	Y	Y	N	pH, caustic level, and liquid-to-gas ratio restrictions for scrubber and temperature restriction for incinerator
P003	3.70 lbs of PE/hr	17-11 (B)(1)		N	N	N	N	N	N	No requirements are necessary to demonstrate compliance with this limit because particulate emissions are negligible.
P003	20 % opacity, as a 6-minute average	17-07 (A)(1)		N	N	N	N	Y	N	No requirements are necessary to demonstrate compliance with this limit because particulate emissions are negligible.
P003	vent streams shall be vented to a flare with no visible emissions, except for periods not to exceed 5 minutes during 120 consecutive minutes	21-09 (TT)		Y	Y	Y	Y	Y	N	The operational restriction is to operate a continuous monitoring and recording device to record the presence of a pilot flame at all times when employing OC.

P004	3.36 lbs of PE/hr	17-11 (B)(1)		Y	Y	Y	Y	N	N	The operational restriction is to maintain scrubber water flow rate at least 15 gallons per minute. No testing required for this issue as previous testing has indicated PE values far less than allowable.
P004	20 % opacity, as a 6-minute average	17-07 (A)(1)		Y	Y	Y	Y	Y	N	The operational restriction is to maintain scrubber water flow rate at least 15 gallons per minute.
P006	5.18 lbs of PE/hr	17-11 (B)(1)		N	N	N	N	N	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P006	20 % opacity, as a 6-minute average	17-07 (A)(1)		N	N	N	N	Y	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P009	5.18 lbs of PE/hr	17-11 (B)(1)		Y	Y	Y	Y	N	N	The operational restriction is to maintain scrubber water flow rate at least 20 gallons per minute. No testing required for this issue as previous testing has indicated PE values far less than allowable.
P009	20 % opacity, as a 6-minute average	17-07 (A)(1)		Y	Y	Y	Y	Y	N	The operational restriction is to maintain scrubber water flow rate at least 20 gallons per minute.
P010	5.18 lbs of PE/hr	17-11 (B)(1)		N	N	N	N	N	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P010	20 % opacity, as a 6-minute average	17-07 (A)(1)		N	N	N	N	Y	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P012	5.18 lbs of PE/hr	17-11 (B)(1)		N	N	N	N	N	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P012	20 % opacity, as a 6-minute average	17-07 (A)(1)		N	N	N	N	Y	N	The allowable is far greater than this emissions unit's PTE; therefore no requirements are necessary to demonstrate ongoing compliance.
P013	3.36 lbs of PE/hr	17-11 (B)(1)		Y	Y	Y	Y	N	N	The operational restriction is to maintain scrubber water flow rate at least 16 gallons per minute. No testing required for this issue as previous testing has indicated PE values far less than allowable.
P013	20 % opacity, as a 6-minute average	17-07 (A)(1)		Y	Y	Y	Y	Y	N	The operational restriction is to maintain scrubber water flow rate at least 16 gallons per minute.
P018	none									
P020	none									
P021	0.94 lb of CS2/hr	Y		N	Y	Y	Y	N	N	No testing necessary as monitoring and record keeping requirements are sufficient.

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 comments. 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.