

Statement of Basis For Title V Permit

(Version 2. - 3/27/98) S.O.B. Date: 1/11/2000

Company Name	TWO LLC	
Premise Number	0448020080	
Number of Non-insignificant Emissions Units	8	
What makes this facility a Title V facility?	TWO LLC manages the wastewater treatment plant for Sunoco R&M Inc. refinery in Toledo. It is situated on the refineries property so their association and close proximity to the refinery makes it a T.V. facility.	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Y	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

- **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	For facilities that have greater than or equal to 10 Mg/yr of benzene, the waste streams that contain benzene, must remove or destroy the benzene.		Y	N	Y	Y	Y	Y	N	Basis: 40 CFR 61 subpart FF - Benzene Waste Operations NESHAP
	The DNF compressors shall be equipped with a seal system that prevents leakage of VOC		Y	N	Y	Y	Y	Y	N	Basis: 40 CFR 60 subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries - Dissolved Nitrogen Floatation (DNF) compressors. The permittee needs to comply with the requirements of 40 CFR subpart VV for the DNF compressors, pursuant to 40 CFR 60.592(a).
	VOC emissions are to be controlled from the wastewater separator by equipping the separator sections with covers and seals	21-09(M)	N	N	N	N	N	N	N	M, R,RP & ET - The permittee is required to control VOC emissions from the wastewater separator by equipping all forebay sections with covers and seals, which are to be kept in a closed position at all times except when in actual use. There are M, R, RP & ET in 40 CFR 61 subpart FF which relates to the API separator, drain systems, closed vent systems and control devices which are more stringent then the OAC rule.
T105, T106, T108, T143	-----	N	Y	N	Y	Y	Y	Y	N	Basis: 40 CFR 61 subpart FF - Benzene Waste Operations NESHAP which requires complying with 40 CFR 60 subpart Kb

T144,
T145
&
T146

	-----	21-09(L)	N	N	N	N	N	N	N	Basis: The emissions limitations established by this rule are equal to or less stringent than 40 CFR 61 subpart FF, so there are no M, R, RP & ET.
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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 requirements. 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.