

Statement of Basis For Title V Permit

Company Name	The Lubrizol Corporation - Painesville Plant
Premise Number	02-43-00-0024
What makes this facility a Title V facility?	VOC and SO2
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

<p>Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)</p>	<p>(Some of these changes by themselves would not have required a Sig. Mod.)</p> <p>Adding synthetic minor language for HAPs to avoid Subpart DDDDD for future boilers and Subpart FFFF requirements based on facility-wide restriction of HAPs emissions to 9.9 and 24.9 TPY.</p> <p>B003 - PTI 02-19897 (mod. emissions unit to burn used oil) B009 - PTI 02-18165 (new emissions unit), this PTI did not include boiler MACT language, this mod. does. P052 - PTI 02-14200 (mod. emission unit to remove language restricting # of reactors vented to flare) P074 - PTI 02-17449 (mod. emission unit to reroute VOC emissions from flare to incinerator) T048 - should have been considered insignificant and has now been moved to Part II</p> <p>T186 - changed carbon adsorber language to incinerator language as it is now vented to an incinerator.</p> <p>For P006, P007, P011, P014, P015, P027, P028, P034, P036, P051, P053, P074:</p> <p style="padding-left: 40px;">Made to look like P012, P013, and P030 where flare is indicated as emergency backup control to incinerator.</p> <p>For P001, P006, P026, P029, P052, and P073:</p> <p style="padding-left: 40px;">SO2 record keeping language modified to allow for batch averaging per discussions with Jim O.</p>
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Part II (State and Federally Enforceable Requirements)		
Term and Condition (paragraph)	Basis	Comments

	SIP (3745-)	Other	
A.1.	N	Y	Chemical Accident Prevention Provisions, 40 CFR Part 68.
A.2. through A.15.	35-07		Synthetic minor emission limitations and associated monitoring, record keeping, and reporting to restrict HAPs emissions for future MACT avoidance.
A.16.	N	Y	40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart DDDDD

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	O R	M	St	ENF	R	St	Rp	S t	E T	Mi s c	Comments
		SIP (3745-)	Other												
B001, B002, B004	20% opacity	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B001, B002, B004	PM: 0.020 lb/mmBTU	17-10(B) (1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B001, B002, B004	SO2: 1.6 lbs/mmBTU	18- 06(D)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: quality of oil shall meet a sulfur content sufficient to comply with 1.6 lbs/mmBTU.
B003	PE: 0.26 lbs/mmBTU	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B003	SO2: 1.6 lbs/mmBTU	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B003	NOx: 9.27 lbs/hr / 40.6 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B003	CO: 3.38 lbs/hr / 14.8 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B003	20% opacity	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or use fuel oil.
B003	none	17-10(c) (1)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

B003	none	18-06(D)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
B009	NOx: 1.76 lbs/hr / 7.73 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B009	CO: 1.48 lbs/hr / 6.49 tons/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N		3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET not applicable.
B009	20% opacity	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B009	PM: 0.020 lb/mmBTU	17-10(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
B009	40 CFR Part 63, Subpart DDDDD	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall burn only natural gas &/or #2 fuel oil.
N001	20% opacity	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: the pressure drop across the baghouse shall be maintained within the range of 1.5 - 8 inches of water while the emissions unit is in operation.
N001	PM: 0.10 lb/100 lbs liquid, semi-solid, solid	-17-09		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: the pressure drop across the baghouse shall be maintained within the range of 1.5 - 8 inches of water while the emissions unit is in operation.
N001	SO2: 39.4 lbs/hr	-18-02(D)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall operate and maintain the wet scrubber at all times the process vent stream is vented to the scrubber in accordance with the following parameters: (a) not less than 2.9 pH; (b) not less than five gallons per 1000 cubic feet liquid-to-gas ratio; and (c) pressure drop not less than 3.5 inches of water.
N001	See 40 CFR 63.1203	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	40 CFR 63, Subpart EEE (MACT for Hazardous Waste Combustors)

P001 - P022 P025 - P036 P053, P054, P073 & P074	VOC: controlled by a flare that meets OAC rule 3745-21-09(D)(10)(d), or by an incinerator that meets OAC rule 3745-21-09(LL)(1)(a)	-21-09(LL)(1)(a)/(b)		N	Y	Y	N	N	Y	N	Y	N	N	N	Unless otherwise exempt, per OAC 3745-21-09(LL)(3)(b): Reactor process vent stream is vented to an enclosed combustion device or a flare for which construction commenced prior to May 25, 1988. OR: The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1600 degrees Fahrenheit; a pilot flame shall be maintained at all times in the flare's pilot light burner. ET: not applicable
P001 - P022 P025 - P036 P050, P052, P053, P054, P073 & P074	VOC: 5 tons/rolling 12-month period if not controlled by flare or incinerator.	-21-09(LL)(3)(a)		N	N	Y	Y	N	Y	Y	Y	N	Y	Y	Monitoring St. for P050: A.III.2. through 4. Reporting St. for P050: A.IV.5. Monitoring St. for P052: A.III.2. through 4. Reporting St. for P052: A.IV.4. & 6. Misc.: If percent control efficiency of control equipment is assumed to be zero, and compliance with the emission limitation of five tons per rolling twelve-month period from all process vent streams is demonstrated by the record keeping required in Section A.III of these terms and conditions, then the permittee may choose not to conduct parametric maintenance, monitoring and reporting as required under A.II, A.III and A.IV.
P001 - P022 P025 - P036 P050 - P054 P073 & P074	Process wastewater discharged to separator equipped with covers and seals which minimize VOC.	-21-09(LL)(2)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp: no requirements established in SIP. ET: not applicable
P001 P026 P029	SO2: 19.05lbs/hr 29.62 lbs/hr 68.8 lbs/hr	-18-06(E)		N	N	Y	N	N	Y	N	Y	N	Y	N	

P006	SO2: 26.99lbs/hr SO2: controlled by caustic wet scrubber.	-18- 06(E)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: permittee shall operate and maintain wet scrubber G-3 (G-3 Scrub) at all times the process vent stream is vented to the scrubber in accordance with the following parameters: (a) not less than 7.00 pH; and (b) not less than two gallons per minute scrubber liquor flow rate.
P011 P012 P013 P014 P022 P030	SO2: 2.4 lbs/hr 160.0 lbs/hr 25.0 lbs/hr 10.0 lbs/hr 20.0 lbs/hr 30.0 lbs/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	Y	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000 Misc.: A statement of certification of the existing continuous SO2 monitoring system shall be maintained ...; permittee shall implement a quality assurance/quality control plan for the continuous SO2 monitoring system ...
P011 P012 P013 P014 P022 P030	Total hourly and annual SO2: 247.4 lbs/hr & 100 tons/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Director's Final Findings and Orders for alternative SO2 emission control strategy, November 9, 2000
P024	20% opacity	-17-07		N	N	Y	N	N	Y	N	Y	N	Y	N	
P024	PE: 3.53 lbs/hr	-17-11		N	N	Y	N	N	Y	N	Y	N	Y	N	
P054	20% opacity PE controlled by wet scrubber (AB-11 WScrb).	-17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: scrubber water flow rate of the wet scrubber shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the scrubber.
P054	PE: 3.07 lbs/hr	-17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: scrubber water flow rate of the wet scrubber shall be continuously maintained at a value of not less than two gallons per minute at all times the process vent stream is vented to the scrubber.

P038 - P049	Prevent liquid drainage from loading arm when not in use or accomplish complete drainage before loading arm is disconnected.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P038 - P049	VOC: 39.95 tons/rolling 12-month period from all emission units.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.
P038 P039 P040 P041 P042 P043 P044 P045 P046 P047 P048 P049	VOC: 23 lbs/hr 12 lbs/hr 170 lbs/hr 90 lbs/hr 47 lbs/hr 23 lbs/hr 12 lbs/hr 22 lbs/hr 12 lbs/hr 12 lbs/hr 12 lbs/hr 12 lbs/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.
P038 P039 P040 P041 P042 P043 P044 P045 P046 P047 P048 P049	VOC: 5.3 tons/yr 2.7 tons/yr 39.95 tons/yr 21 tons/yr 8.3 tons/yr 5.3 tons/yr 6.9 tons/yr 13 tons/yr 6.9 tons/yr 6.9 tons/yr 6.9 tons/yr 6.9 tons/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.

P040 & P041	Loading of anglamols accomplished so displaced vapors/gases be vented to carbon adsorption system: operated with sufficient volumetric flow; upon detection of break through, immediately recharge/ replace with fresh carbon.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P040, P041 & P049	Loading of gasoline additives accomplished either through submerged fill loading line or bottom loaded.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P042	Loading of sodium hydro sulfide accomplished such that all displaced vapors/gases be vented to caustic scrubber which discharges to fume incinerator AC-6 or AC-7.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable

P043	HCl: 8.30 lbs/ hr & 5 tons/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.
P047	1.4 lbs/hr & .9 ton/yr														
P043 & P047	Displaced vapors/gases vented to a water scrubber which, for P043, discharges to elevated flare AE-7.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable
P045	Displaced vapors/gases vented to a caustic scrubber (Z-13)	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable.
P050	VOC: 1.1 lbs/hr HCl: .86 lb/hr & 3.8 tons/yr	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: scrubber liquor of wet scrubber AK-1 (AK-1 WScrb) shall be maintained such that the solution will not exceed 13.0 percent weight hydrochloric acid. The scrubber water flow rate shall be continuously maintained at a value of not less than two gallons per minute. Monitoring St: A.III.2. through 7. Reporting St.: A.IV.4. & 6.
P050	HCl shall be controlled by a packed column scrubber.	N	Y	N	N	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. Monitoring St: A.III.5. & 7. Reporting St.: A.IV.4. & 6. ET: not applicable

P051	VOC: 31.08 lbs/batch & 11.34 tons/yr	N	Y	N	N	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. Monitoring St: A.III.2. through 4. Reporting St.: A.IV.2. & 3.
P051	VOC controlled at all times by an incinerator.	N	Y	N	N	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. Monitoring St: A.III.7. Reporting St.: A.IV.5. ET: not applicable
P051, P052 & P073	Incinerator shall reduce VOC by at least 98% by weight.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: average combustion temperature within the thermal incinerator shall not be less than 1600 degrees Fahrenheit at all times the emissions unit is in operation, unless the permittee demonstrates that 98% by weight can be achieved at a lower temperature.
P052	VOC: 130.8 lbs/day, 16.14 tons/yr from reactors and holding tanks, 4.29 tons/yr from feed tanks, 4.43 tons/yr from filters Include requirements of OAC rules 3745-21-09(LL) and 3745-31-05(D)	N	Y	N	N	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. Monitoring St: A.III.2. through 4. Reporting St.: A.IV. 2.

P052	SO2: 21.05 lbs/hr and 15.6 tons/yr SO2 : controlled by the scrubber prior to exhausting to the flare.	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: pH of the scrubber liquor shall be maintained at minimum of 7.5 while the scrubber is in use. Monitoring St: A.III.5., 6. 11. & 12. Reporting St.: A.IV.5., 6. & 9.								
P052	VOC: 24.86 tons/rolling 12-month period	N	Y	N	Y	Y	Y	N	Y		Y	N	Y	N	3745-31-05(D); <u>all</u> of the requirements have been transferred from the permit to install. OR: maximum annual number of "solvent-containing" batches, excluding the methanol batches, shall not exceed 2,867, based upon a rolling, 12-month summation of the production rates. To ensure enforceability during the first 12 calendar months of operation, permittee shall not exceed: <table style="margin-left: 40px;"> <thead> <tr> <th style="text-align: left;">Month Batches</th> <th style="text-align: left;">Maximum Allowable Number of "solvent-containing" Batches</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>239</td> </tr> <tr> <td>to</td> <td></td> </tr> <tr> <td>1-12</td> <td>2867</td> </tr> </tbody> </table> After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual limitation of "solvent-containing" batches shall be based upon a rolling, 12-month summation of the number of batches. Monitoring St: A.III.2. through 4. Reporting St.: A.IV.3.	Month Batches	Maximum Allowable Number of "solvent-containing" Batches	1	239	to		1-12	2867
Month Batches	Maximum Allowable Number of "solvent-containing" Batches																						
1	239																						
to																							
1-12	2867																						
P052	VOC: controlled by either an incinerator or a flare unless otherwise exempted by OAC 3745-21-09(LL)(3).	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. ET: not applicable								

P052 & P073	The flare designed/ operated according to OAC 3745-21-09(DD)(10) (d)	N	Y	N	Y	Y	Y	N	Y	Y	Y	N	N	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: pilot flame shall be maintained at all times in the flare's pilot light burner. Monitoring St for P052: A.III.13. Reporting St. for P052: A.IV.12. & 13. Monitoring St. for P073: A.III.10. Reporting St. for P073: A.IV.7. & 8. ET: not applicable
P052 & P073	none	-18-06(E)		N	N	N	N	N	N	N	N	N	N	N	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P055, P057, P058, P062 & P063	Not load more than 40,000 gal. of any volatile photochemically reactive material in loading rack unless vented to adsorption system.	-21-07(E)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR: carbon adsorber system shall process and recover at least ninety per cent by weight of all vapors and gases from the equipment being controlled.
P055, P057, P058, P062 & P063	Displaced vapors/gases vented only to the adsorption system.	-21-07(E)		N	N	Y	N	N	Y	N	Y	N	Y	N	

P055 - P071	Prevent liquid drainage from loading arm when not in use or accomplish complete drainage before the loading arm is disconnected.	-21-07(E)		N	N	N	N	N	N	N	N	N	N	N	M, R, Rp: no requirements established in SIP. ET: not applicable
P059	VOC: 27.36 lbs/day & 5.0 tons/year	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: The maximum, ave. daily throughput of lubricant additives & anglamols, combined, shall not exceed 12,000 gallons. The max. loading loss for materials loaded in this emissions unit shall not exceed 2.28 lbs VOC/1000 gallons loaded.
P056, P060-P061, P064-P071	Not load more than 40,000 gallons of any volatile photochemically reactive material in loading rack during any one day.	-21-07(E)		N	N	Y	N	N	Y	N	Y	N	N	N	ET: not applicable
P073	VOC: 5.37 lbs/batch & 1.0 tons/year from all process vent streams controlled by the fume incinerator &/or flare; 26.8 lbs/batch from all process vent streams not controlled by the fume incinerator or flare.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.

P073	SO2: 10 lbs/day & 1.8 tons/year Potential SO2 emissions above de minimis shall be controlled by the scrubber prior to exhausting to flare.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install. OR: Permittee shall operate/maintain wet scrubber in accordance with the following: (a) not less than 7.5 pH when using caustic scrubber liquor; (b) not more than 6.5 pH when using Anthium dioxide; and (c) not less than two gallons per minute scrubber liquor flow rate.
P074	VOC: 3.5 lbs/batch & 1.0 tons/year from all process vent streams controlled by the incinerator; 17.5 lbs/batch from all process vent streams not controlled by the incinerator.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.
P074	NO2: 25 lbs/batch & 7.0 tons/year	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install.
P074	none	-23-06(B)		N	N	N	N	N	N	N	N	N	N	N	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).

T013 - T186	When storing liquid organic materials: no volatile photochemically reactive material. When storing petroleum liquids: no vapor pressures of greater than 1.52 psia.	-21-07(D) or -21-09(L)		Y	N	Y	Y	N	Y	Y	Y	N	N	N	ND: T122, T123, T136 & T186 are exempt from OAC rule 3745-21-09(L)(1) because each tank has a capacity of less than 40,000 gallons. Monitoring St. (T077 & T186): A.III.2. Reporting St. for T077: A.IV.3. & 4. Reporting St. for T186: A.IV.3. ET: not applicable
T077 & T186	VOC: 0.25 tons/yr	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	Y	Y	3745-31-05(A)(3); <u>all</u> of the requirements have been transferred from the permit to install Monitoring St. for T077: A.III.2. Monitoring St. for T186: A.III.2. & 3. Reporting St. (T077 & T186): A.IV.2. Testing St. (T077 & T186): A.V.2a.

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.