# Statement of Basis For Title V Permit

| Part I - General | |
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| Company Name | 3M |
| Premise Number | 02-47-04-0822 |
| What makes this facility a Title V facility? | Volatile Organic Compounds and HAP |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 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. | Yes, all of the emissions units are vented to a common header before going to the control system. |
| 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 minor permit modification per OAC rule 3745-77-08(C)(1) | N/A |
| 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) | N/A |
| 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 reopening per OAC rule 3745-77-08(D) | N/A |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E) | N/A |

| Part II (State and Federally Enforceable Requirements) | | | |
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| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745- ) | Other | |
| A.1 | | 40 CFR Part 63, Subpart UUUU | Applicability of the subpart to this facility. |
| A.2 | 77-07(A)(13) | | identification of IEU with applicable requirements |

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 and Federally Enforceable Section) | | | | | | | | | | | | | | | |
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| 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 | | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | Comments |
| | | SIP (3745- ) | Other | | | | | | | | | | | | |
| P001 | 0.25 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P001 | 1.1 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P001 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P001 | Combined facility emissions of OC shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P001 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P001 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUUY | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P001 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | Y 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P001 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUUY | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |
| P001 | All vent streams vented to a control device shall be routed through a closed-vent system | N | Y 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P001 | Bypass lines shall be secured with a lock | N | Y 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P002 | 0.25 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | 1.1 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P002 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P002 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |

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| P002 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P002 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P003 | 8.5 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | 37.22 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | 0.76 lb/hr of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P003 | 3.33 TPY of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | Combined facility $H_2S$ emissions shall not exceed 2.27 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | Combined facility emissions of $H_2S$ shall not exceed 9.95 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P003 | APC shall capture at least 85 percent of all facility OC emissions and $H_2S$ emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P003 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |
| P003 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P003 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P004 | 8.5 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | 37.22 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P004 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | 0.76 lb/hr of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | 3.33 TPY of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | Combined facility $H_2S$ emissions shall not exceed 2.27 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | Combined facility emissions of $H_2S$ shall not exceed 9.95 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P004 | APC shall capture at least 85 percent of all facility OC emissions and $H_2S$ emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P004 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |
| P004 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P004 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P005 | 2.76 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P005 | 12.1 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | 0.25 lb/hr of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | 1.10 TPY of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | Combined facility $H_2S$ emissions shall not exceed 2.27 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | Combined facility $H_2S$ emissions shall not exceed 9.95 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P005 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P005 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |

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| P005 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P005 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P007 | 25.88 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | 113.34 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | 0.12 lb/hr of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P007 | 0.53 TPY of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | Combined facility $H_2S$ emissions shall not exceed 2.27 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | Combined facility $H_2S$ emissions shall not exceed 9.95 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P007 | APC shall capture at least 85 percent of all facility OC emissions and $H_2S$ emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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| P007 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |
| P007 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P007 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P008 | 0.25 lb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | 1.1 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P008 | Combined facility emissions of OC shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P008 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P008 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P008 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P009 | 0.25 llb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | 1.1 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | Combined facility emissions of OC shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P009 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P009 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - If required |

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P009 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P009 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Compliance is demonstrated with monitoring and record keeping. |
| P010 | 4.16 llb/hr of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | 18.24 TPY of OC | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | Combined Facility OC emissions shall not exceed 50.8 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | Combined facility OC emissions shall not exceed 222.5 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | 0.38 lb/hr of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P010 | 1.66 TPY of $H_2S$ | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | Combined facility $H_2S$ emissions shall not exceed 2.27 lbs/hr | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | Combined facility $H_2S$ emissions shall not exceed 9.95 TPY | 31-05 | N | N | Y | Y | N | N | Y | N | Y | N | N | N | OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | The sum of all uncontrolled sulfide emissions shall be reduced by at least 75 percent based on a six-month rolling average. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | APC equipment shall remove at least 80 percent of OC vented to it. | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |
| P010 | APC shall capture at least 85 percent of all facility OC emissions and H2S emissions | N | Y | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU<br>OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction<br>ET - Method 15, if required |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| P010 | Negative pressure within manufacturing area | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction ET - If required |
| P010 | All vent streams vented to a control device shall be routed through a closed-vent system | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction ET - Compliance is demonstrated with monitoring and record keeping. |
| P010 | Bypass lines shall be secured with a lock | N | 40 CFR Part 63 Subpart UUUU | N | Y | Y | N | N | Y | N | Y | N | N | N | Other - 40 CFR, Part 63, Subpart UUUU OR - Pressure drop across APC, Temp. restriction, sulfate conc., pH restriction ET - Compliance is demonstrated with monitoring and record keeping. |
| | | | | | | | | | | | | | | | |

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

- <u>Instructions for Part III:</u>

  - 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 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.
  2. 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.

- Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.