

Statement of Basis For Title V Permit

Part I - General	
Company Name	Ross Sand Casting Industry, LLC
Premise Number	02-85-01-0034
What makes this facility a Title V facility?	CO
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.	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 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)	Emissions Unit P029 removed in 2002. Emissions Unit P030 Tumblast blast booth #3 permitted under 02-20143 (11/16/04) Emissions Unit P901 Laempe III (L-20) permitted under 02-20143 (01/10/06) Emissions Unit P902 Laempe II (L-5) permitted under 02-20143 (01/10/06) Emissions Unit P903 Super 22 Shotblast permitted under 02-20143 (01/10/06) Emissions Unit P904 Super 28 Shotblast permitted under 02-20143 (01/10/06)

Part II (State and Federally Enforceable Requirements)
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Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1.	25-03		emissions control action program
B.2.		Consent decree	requirement to maintain closed-loop cooling water recycling system

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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)															
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	<u>Comments</u>
		SIP (3745-)	Other												
See comments section	n/a	17-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	F003, F005, F006, F007, F008, F018, F019, F020, F027, F028, F029, F030, F031, P011, P014, P019, P020, P021, P023, P025, P026, P027, P901, P902, P903, and P904 are all non-appendix A area - exempt
See comments section	n/a	17-07(B)	N	N	N	N	N	N	N	N	N	N	N	N	F003, F005, F006, F007, F008, F018, F019, F020, F027, F028, F029, F030, F031, P011, P014, P019, P020, P021, P023, P025, P026, P027, P901, P902, P903, and P904 are all non-appendix A area - exempt
See comments section	n/a	17-07(A)	N	N	N	N	N	N	N	N	N	N	N	N	Less stringent than 31-05(A)(3) (BAT) for F006, F008, F018, F019, F031, P011, P026, P027, P903, and P904

See comments section	n/a	17-11(B)	N	N	N	N	N	N	N	N	N	N	N	N	Less stringent than 31-05(A)(3) (BAT) for F006, F008, F018, F019, F031, P011, P014, P020, P021, P023, P025, P026, P027, P901, P902, P903, and P904
See comments section	n/a	17-07(A)	N	N	N	N	N	N	N	N	N	N	N	N	Pursuant to 17-07(A)(3)(h), this rule does not apply to P020, P021, P023, P025, P901, and P902
F003	3.84 lbs PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Engineering Guide 16 used to determine testing frequency.
F003	20%, 6-min ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Visible emission testing only required if requested.
F003	38.4 TPY PE	N	Y	N	N	Y	N	N	Y	N	N	N	N	N	31-05(A)(3) (BAT) limit - Permittee records amount of metal processed annually to be viewed during Ohio EPA inspection.
F005	3.84 lbs PE/hr, 9.9 TPY	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Fugitives only, visible emission testing only required if requested.
F005	0.24 lb SO2/hr and 0.62 TPY	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - Compliance based on record keeping w/ emission calculation.
F005	0.12 lb NOx/hr and 0.30 TPY	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - Compliance based on record keeping w/ emission calculation.
F005	24 lbs CO/hr and 61.9 TPY	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - Compliance based on record keeping w/ emission calculation.
F005	20%, 3-min ave	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - Fugitives only, visible emission testing only required if requested.
F005	n/a	18-06	N	N	N	N	N	N	N	N	N	N	N	N	Less stringent than 31-05(A)(3) (BAT)
F006	184.1 lbs/hr SO2	18-06	N	N	N	N	N	N	N	N	N	N	N	N	This emission limit is greater than the PTE for this unit, therefore compliance is assumed.

F006	0.54 lb/hr PE and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F006	Fug. PE 5.1 lbs/hr	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Fugitives only, visible emission testing only required if requested.
F006	0.42 lb VOC/hr	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Compliance based on record keeping w/ emission calculation.
F006	0%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F007	20%, 6-min ave.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Visible emission testing only required if requested.
F007	16.23 lbs PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Engineering Guide 16 used to determine testing frequency.
F007	n/a	21-07(G)	N	N	N	N	N	N	N	N	N	N	N	N	Exempt pursuant to 21-07(A)(1)
F008	1.52 lbs/hr PE and 0.006 gr/dscf (BH)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F008	1.43 lbs/hr PE and 0.015 gr/dscf (WS)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F008	5%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F008	0%, 6-min ave (fug)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F008	7.23 TPY PE	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F018	11.02 TPY PE	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit

F018	0.339 TPY lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F018	1.85 lbs/hr PE and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F018	0.0086 lbs/hr lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F018	5%, 6- min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F018	10%, 6- min ave (fug)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F019	11.02 TPY PE	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F019	0.339 TPY lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F019	1.85 lbs/hr PE and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F019	0.0086 lbs/hr lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F019	5%, 6- min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F019	10%, 6- min ave (fug)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F027	no PRMs	21- 07(G)	N	N	N	Y	Y	N	Y	Y	Y	Y	N	N	Exempt, as long as no photochemically reactive materials are employed
F027	5 lbs OC/hr, 21.9 TPY	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - record keeping to ensure limits are not exceeded.

F027	0.12 lb PE/hr, 0.53 TPY	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F027	20%, 3-min ave	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
F028	no PRMs	21-07(G)	N	N	N	Y	Y	N	Y	Y	Y	Y	N	N	Exempt, as long as no photochemically reactive materials are employed
F028	7.59 lbs OC/hr, 18 TPY	N	Y	N	N	Y	Y	N	Y	Y	N	N	N	N	31-05(A)(3) (BAT) limit - record keeping to ensure limits are not exceeded.
F028	0.24 lb PE/hr, 1.05 TPY	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F028	20%, 3-min ave	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
F029	20%, 6-min ave	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Visible emission testing only required if requested.
F029	3.9 lbs PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Engineering Guide 16 used to determine testing frequency.
F031	11.02 TPY PE	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F031	0.339 TPY lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(D) limit - stack testing required for short term limit which relates to this annual limit
F031	1.85 lbs/hr PE and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F031	0.0086 lbs/hr lead	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
F031	5%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
F031	10%, 6-min ave (fug)	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.

P011	1.02 lbs PE/hr (0.01 gr/dscf), 4.4 TPY	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P011	9.9 TPY fug.	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
P011	5%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P011	20%, 3-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P014	0.39 lb PE/hr (0.01 gr/dscf), 1.7 TPY	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P014	3.0 TPY fug.	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
P014	20%, 6-min ave	17-07(A)	N	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Visible emission testing only required if requested.
P014	20%, 3-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P019	20%, 6-min ave	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Visible emission testing only required if requested.
P019	16.8 lbs PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Engineering Guide 16 used to determine testing frequency.
P020	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed
P020	4.2 lbs methyl formate/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P020	0.05 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
P021	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed

P021	6.3 lbs methyl formate/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P023	see comments	21-07(G)	N	N	N	N	N	N	N	N	N	N	N	N	exempt, pursuant to 21-07(G)(9)(h)
P023	9.1 lbs VOC/hr	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P023	0.052 lb PE/hr	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P025	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed
P025	4.2 lbs methyl formate/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P025	0.05 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
P026	367 lbs/hr SO2	18-06	N	N	N	N	N	N	N	N	N	N	N	N	This emission limit is greater than the PTE for this unit, therefore compliance is assumed.
P026	2.72 lbs PE/hr and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P026	1.78 TPY fug.	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance.
P026	0.84 TPY VOC	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance. No testing necessary.
P026	0%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P027	0.231 lbs PE/hr and 0.006 gr/dscf	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P027	1.34 TPY fug.	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Calculation with emission factor demonstrates compliance.

P027	9.36 lbs VOC/ hr	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P027	0%, 6-min ave	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P028	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed
P901	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed
P901	0.048 TPY Fug.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P901	0.064 lbs PE/hr and 0.015 gr/dscf, 0.28 TPY	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P901	5%, 6-min ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P901	5%, 3-min ave	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P901	4.20 lbs VOC/hr and 18.40 TPY	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P902	no PRMs	21-07(G)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Exempt, as long as no photochemically reactive materials are employed
P902	0.048 TPY Fug.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P902	0.042 lbs PE/hr and 0.01 gr/dscf, 0.19 TPY	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P902	5%, 6-min ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.

P902	0.65 lbs VOC/hr and 2.85 TPY	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Compliance determined through record keeping.
P902	5%, 3-min ave	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P903	5%, 6-min ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P903	5%, 3-min ave	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P903	2.72 TPY Fug.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P903	0.34 lbs PE/hr and 0.01 gr/dscf, 1.49 TPY	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.
P904	5%, 6-min ave.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P904	5%, 3-min ave	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P904	3.42 TPY Fug.	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	31-05(A)(3) (BAT) limit - Visible emission testing only required if requested.
P904	0.34 lbs PE/hr and 0.01 gr/dscf, 1.49 TPY	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	31-05(A)(3) (BAT) limit - Engineering Guide 16 used to determine testing frequency.

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.
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.

C **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.