

Statement of Basis For Title V Permit

Part I - General	
Company Name	Whirlpool Corporation - Clyde Division
Premise Number	0372020143
What makes this facility a Title V facility?	VOC, HAPs
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.	NO
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)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.a		40 CFR Part 63	States applicability of MACT rule Subpart NNNN for emissions units K005, K009, K010, K011 & K012
A.1.b		40 CFR Part 63	States applicability of MACT rule Subpart DDDDD for emissions units B002, B003, B004, B005, B006, B007, B008, B009 & B010
A.2		40 CFR Part 63	States applicability of MACT rule Subpart NNNN for insignificant emissions units Z145, Z146 & Z147
A.2.a		40 CFR Part 63	States MACT rule Subpart NNNN emission limitation of 0.13 kg/liter (1.1 lb/gal) of coating solids used during each compliance period
A.2.b		40 CFR Part 63	States compliance options for MACT rule Subpart NNNN
A.2.c		40 CFR Part 63	States monitoring and recordkeeping requirements for MACT rule Subpart NNNN
A.2.d		40 CFR Part 63	States reporting requirements for MACT rule Subpart NNNN

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)														
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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments

		SIP (3745-)	Other												
B002, B003, B004	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas, LPG or #2 fuel oil. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
B002, B003, B004	0.020 lb PE/mmBtu of actual heat input	17-10(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas, LPG or #2 fuel oil. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on appropriate emission factors, maximum hourly fuel usage and dividing by maximum heat input capacity are sufficient to show compliance, therefore, no testing is required.
B002, B003, B004	1.6 lbs SO ₂ /mmBtu of actual heat input	18-06(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas, LPG or #2 fuel oil and maximum sulfur content of #2 fuel oil. M and R includes type of fuel, fuel usage, #2 fuel oil sulfur content, #2 fuel oil heat content and the calculated SO ₂ emission rate (lbs/mmBtu) of #2 fuel oil not to exceed 1.6 lbs/mmBtu. A CEM is not economically justified. CAM is not currently applicable. ET-This limitation is based on the maximum sulfur content of natural gas allowed for this emission unit and represents the worst case scenario emissions, therefore, no testing is required.
B005, B006, B007	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas, LPG or #2 fuel oil. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

B005, B006, B007	0.020 lb PE/mmBtu of actual heat input	17-10(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas, LPG or #2 fuel oil. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on appropriate emission factors, maximum hourly fuel usage and dividing by maximum heat input capacity are sufficient to show compliance, therefore, no testing is required.
B005, B006, B007	Exempt	18-06(D)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Since natural gas/LPG is the only fuel fired in these emissions unit, no SO2 emission limitation is established pursuant to OAC rule 3745-18-06(A) for this emissions unit. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
B005, B006, B007	Exempt	21-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Since natural gas/LPG is the only fuel fired in these emissions units, no CO emissions limitation is established pursuant to OAC rule 3745-21-08(B). Satisfy best available control techniques and operating practices by committing to comply with best available technology requirements established pursuant to OAC rule 3745-31-05.
B008, B009, B010	Visible PE from shall not exceed 20% opacity as a six-minute average, except as provided by rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel used. A CEM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
B008, B009, B010	0.551 lb PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel used. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on appropriate emission factors and maximum hourly fuel usage are sufficient to show compliance, therefore, no testing is required.

B008, B009, B010	Exempt	18-06(E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - These emissions units are exempt from the sulfur dioxide emission limitation specified in OAC rule 3745-18-06(E) pursuant to OAC rule 3745-18-06(C) because the PWR of the emissions unit is less than 1000 lbs/hr since NG and LPG are the only fuels fired. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
K005, K009, K010, K011	2.8 lbs VOC/gal coating, excluding water and exempt solvents	21-09(K)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M & R for material additions to E-coat dip tank and calculated daily, volume weighted average VOC content of material adds. ET-The M, R & Rp requirements are sufficient to demonstrate compliance, therefore no testing is required
K010, K012	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
K010	0.877 lb PE/hr	17-11(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring testing
K010	3.5 lbs VOC/gal coating, as a daily volume-weighted average, excluding water and exempt solvents	21-09(K)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M & R for material additions to E-coat dip tank and calculated daily, volume weighted average VOC content of material adds. ET-The M, R & Rp requirements are sufficient to demonstrate compliance, therefore no testing is required
K012	1.4 lb PE/hr	17-11(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring testing

N001, N002, N003,N 004	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
N001	0.10 lb PE/100 lbs of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator	17-09(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - no testing is required in accordance with Engineering Guide #16
N002, N003,N 004, P021	0.10 lb PE/100 lbs of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator	17-09(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring testing
P021, P023, P025	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M and R include daily checks for presence or absence of visible emissions ET - The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P023, P025	Exempt	17-09(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

B005	1.6 lbs NOx/hr	N	31- 05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B005	7.0 tons NOx/yr	N	31- 05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B005	0.24 lbs PE/hr	N	31- 05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B005	1.05 tons PE/yr	N	31- 05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B006	4.44 lbs PE/day	N	31- 05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.

B006	0.81 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B006	25.9 lbs NOx/day	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B006	4.7 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B006	10.4 lbs CO/day	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B006	1.8 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

B007	0.89 lb NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B007	3.89 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B007	0.16 lb PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the appropriate emission factor and the maximum hourly fuel consumption are sufficient to show compliance, therefore, no testing is required.
B007	0.68 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas or LPG. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
K005, K009, K010, K011	total VOC emissions from K005, K009, K010 & K011 combined shall not exceed 460 tons/year	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	M and R includes material usage, VOC content and VOC emissions. A CEM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring testing

K012	N/A	N	31-05(A)(3)	Y	N	N	N	N	N	N	N	N	N	N	ND - no limits established pursuant to OAC rule 3745-31-05(A)(3) M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
N001, N002, N003, N004	1.0 lb PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of control device (afterburner), operated and maintained in accordance with manufacturer's specifications and operational practices in accordance with manufacturer's recommendations. M and R include daily visible emission checks, records of temperature in secondary combustion chamber and operation/maintenance log. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the maximum charging capacity and the requirement of 0.1 lb PE/100 lbs material charged are sufficient to show compliance, therefore, no testing is required.
N001, N002, N003, N004	4.38 tons PE/yr	N	31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	OR-Use of control device (afterburner), operated and maintained in accordance with manufacturer's specifications and operational practices in accordance with manufacturer's recommendations. M and R include daily visible emission checks, records of temperature in secondary combustion chamber and operation/maintenance log. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
N001, N002, N003, N004	Visible particulate emissions shall not exceed 5% opacity, except for 6 minutes in any continuous period during which opacity shall not exceed 10%	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of control device (afterburner), operated and maintained in accordance with manufacturer's specifications and operational practices in accordance with manufacturer's recommendations. M and R include daily visible emission checks, records of temperature in secondary combustion chamber and operation/maintenance log. A CEM is not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

P021	Exempt	N	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	ND - The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-09(B) and 3745-17-07(A).
P023	0.13 lb PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of control device (afterburner), operated and maintained in accordance with manufacturer's specifications and operational practices in accordance with manufacturer's recommendations. M and R include daily visible emission checks, records of temperature in secondary combustion chamber and operation/maintenance log. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the maximum charging capacity and the requirement of 0.05 lb PE/100 lbs material charged are sufficient to show compliance, therefore, no testing is required.
K010, K011	0.90 kg VOC/liter of applied coating solids based on a volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR, Part 60, Subpart SS
B002, B003, B004, B005, B006, B007, B009	See Rule	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart DDDDD - As required pursuant to 40 CFR Part 63, Subpart DDDDD, these emissions units are subject to only the initial notification requirements in 40 CFR, Part 63.9(b).

B008, B010	See Rule	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-40 CFR, Part 63, Subpart DDDDD - As required pursuant to 40 CFR Part 63, Subpart DDDDD, these emissions units are not subject to the initial notification requirements in 40 CFR, Part 63.9(b).
K005, K009, K010, K011, K012	0.13 kg/liter (1.1 lbs/gal) of coating solids used during each compliance period	N	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR, Part 63, Subpart NNNN M and R, Rp, & ET - as required pursuant to 40 CFR, Subpart NNNN, Sections 63.4130, 63.4120, and 63.4140 respectively.

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.