

Statement of Basis For Title V Permit

Part I - General	
Company Name	Neaton Auto Products Manufacturing, Inc.
Premise Number	08-68-03-0155
What makes this facility a Title V facility?	Organic Compound (OC), as part of this Title V renewal the facility has requested synthetic minor limits for HAPs.
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Y
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
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)

CAM was added to emissions unit K016, the authority for each term was added, Synthetic minor limits for HAP was added on the State and Federally Enforceable Section, The 'superceding' language was revised with the 'streaming' term that was worked out with USEPA. Emissions units B001, K003, K004, K009, K011, K012, K013 and K037 were shutdown, PTI 08-3782 was issued 01/14/98 for emissions units P041, P042, P043 and P044, PTI 08-04363 was issued 05/23/2002 for emissions units K016, K017, K020 and K021, PTI 08-04508 was issued 06/19/03 for emissions unit K022, PTI 08-04640 was issued 02/24/2005 for emissions unit R019 previously permitted as K019 in PTI 08-03798.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.3, A.4, A.5, A.6. and A.7. Renewal		OAC rule 3745- 35- 07(B)	The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for the entire facility will be required to monitor compliance.
A.1.		40 CFR Part 64	The Ohio EPA has approved the compliance assurance monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units K016. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions unit.

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	<u>Comments</u>
		SIP (3745-)	Other												

K007 and R019	none - see comments section	21-07(G)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>The use of photochemically reactive materials is prohibited.</p> <p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
K016, K017, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P019, P020, P039, P040 and R019	see comments section	21-07(G)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p>
K022, P021, P024, P026, P027, P041, P042, P043, P044	The OC emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.	21-07(G)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	<p>ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.</p>

K020, K021,	none - see comments section	21-07(G)(9)		N	Y	Y	N	N	Y	N	Y	N	N	N	The use of photochemically reactive materials is prohibited. ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
K007, K016, K017, R019, K020, K021, K022	The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hour from any stack associated with this emissions unit.	17-11(B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR- The permittee shall operate the filtration system when the emissions unit is in operation. ET- The filtration system operational restriction, monitoring, record keeping and reporting requirements are sufficient to ensure compliance.
K007, K016, K017, R019, K020, K021, K022	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.	17-07(A)		N	N	N	N	N	N	N	N	N	N	N	The filtration system operational restriction, monitoring, record keeping and reporting requirements are sufficient to ensure compliance.

K007	4.8 lbs OC/hr	31- 05(A)(3)	PTI 08- 1853	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	15.02 tons OC/yr	31- 05(A)(3)	PTI 08- 1853	N	N	N	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 1853	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
K016	1.63 lbs OC/hr	31- 05(A)(3)	PTI 08- 0436 3	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit. CAM is currently applicable.
	26.7 lbs OC/day	31- 05(A)(3)	PTI 08- 0436 3	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	3.03 tons OC/yr	31- 05(A)(3)	PTI 08- 0436 3	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 0436 3	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.

K017	6.5 lbs OC/hr	31- 05(A)(3)	PTI 08- 0436 3	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
	40.0 lbs OC/day	31- 05(A)(3)	PTI 08- 0436 3	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	7.3 tons OC/yr	31- 05(A)(3)	PTI 08- 0436 3	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 0436 3	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
R019	8.11 lbs OC/hr (non- PRM)	31- 05(A)(3)	PTI 08- 0464 0	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
	107.4 lbs OC/day (non- PRM)	31- 05(A)(3)	PTI 08- 0464 0	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	12.78 tons OC/yr (non- PRM)	31- 05(A)(3)	PTI 08- 0464 0	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	4.84 lbs OC/hr (PRM)	31- 05(A)(3)	PTI 08- 0464 0	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
	12.47 lbs OC/day (PRM)	31- 05(A)(3)	PTI 08- 0464 0	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.

	2.28 tons OC/yr (PRM)	31-05(A)(3)	PTI 08-04640	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31-05(A)(3)	PTI 08-04640	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
K020	26.44 lbs OC/hr	31-05(A)(3)	PTI 08-04363	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
	173.2 lbs OC/day	31-05(A)(3)	PTI 08-04363	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	21.2 tons OC/yr	31-05(A)(3)	PTI 08-04363	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31-05(A)(3)	PTI 08-04363	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
K021	6.68 lbs OC/hr	31-05(A)(3)	PTI 08-04363	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
	40.1 lbs OC/day	31-05(A)(3)	PTI 08-04363	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	4.81 tons OC/yr	31-05(A)(3)	PTI 08-04363	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.

	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 0436 3	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
K022	4.0 tons OC/yr	31- 05(A)(3)	PTI 08- 0450 8	N	N	Y	N	N	Y	N	Y	N	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 0450 8	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P001, P002, P003, P004, P005 and P006	1.6 lbs OC/hr	31- 05(A)(3)	PTI 08- 639	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	33.2 lbs OC/day	31- 05(A)(3)	PTI 08- 639	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	4.32 tons OC/yr	31- 05(A)(3)	PTI 08- 639	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 639	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P007, P008	1.6 lbs OC/hr	31- 05(A)(3)	PTI 08- 1348	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	40.0 lbs OC/day	31- 05(A)(3)	PTI 08- 1348	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	4.183 tons OC/yr	31- 05(A)(3)	PTI 08- 1348	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 1348	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P009, P010	1.6 lbs OC/hr	31- 05(A)(3)	PTI 08- 1320	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	40.0 lbs OC/day	31- 05(A)(3)	PTI 08- 1320	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	4.37 tons OC/yr	31- 05(A)(3)	PTI 08- 1320	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 1320	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P019 and P020	1.6 lbs OC/hr	31- 05(A)(3)	PTI 08- 1489	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	38.4 lbs OC/day	31- 05(A)(3)	PTI 08- 1489	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	4.5 tons OC/yr	31-05(A)(3)	PTI 08-1489	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31-05(A)(3)	PTI 08-1489	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P021, P024, P026 and P027	6.24 tons OC/yr	31-05(A)(3)	PTI 08-1651	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31-05(A)(3)	PTI 08-1651	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P039 and P040	1.6 lbs OC/hr	31-05(A)(3)	PTI 08-3045	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	40.0 lbs OC/day	31- 05(A)(3)	PTI 08- 3045	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	7.3 tons OC/yr	31- 05(A)(3)	PTI 08- 3045	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 3045	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.
P041	7.3 tons OC/yr	31- 05(A)(3)	PTI 08- 3742	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31- 05(A)(3)	PTI 08- 3742	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.

P042, P043 and P044	7.3 tons OC/yr	31-05(A)(3)	PTI 08-3782	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET- compliance shall be demonstrated through record keeping and reporting requirements, therefore emissions testing is not required. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coating and cleanup materials. St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	2.41 tons PE/yr	31-05(A)(3)	PTI 08-3782	N	N	N	N	N	N	N	N	N	N	N	The annual limitation is reflective of the potential to emit for this emissions unit. Therefore it is not necessary to develop monitoring, record keeping, or reporting and emission testing to ensure compliance with this limit.

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.