Statement of Basis For Title V Permit

Company Name	ISG Cleveland, Inc.
Premise Number	13-18-00-1613
What makes this facility a Title V facility?	Particulate emissions, nitrogen oxides and sulfur dioxide
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.a, b, c, d	15-06		Malfunction and maintenance reporting
A.2.a, b	17-07 (B)		Federal enforceability of opacity limits
A.3.a	25-03		Emission control action program
A.4.a, b, c, d	17-07 (A)		Federal enforceability of opacity limits

? **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001, B002, B003, B004, B005, B006 and B007	20% opacity as a 6-minute average	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The quality of oil will be monitored to ensure it meets specifications for an acceptable byproduct of combustion. ET-Permittee shall demonstrate compliance through USEPA Method 9. Emission testing is not necessary due to the restriction of these boilers to natural gas, No. 6 fuel oil and blast furnace gas.
B001, B002 and B003	0.086 lb/mmBtu PE	17-12 (P)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The quality of oil will be monitored to ensure it meets specifications for an acceptable byproduct of combustion. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements. Emission testing is not necessary due to the restriction of these boilers to natural gas, No. 6 fuel oil and blast furnace gas.
B001, B002 and B003	0.99 lb/hr SO2 per mmBtu		40 CFR 52	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The sulfur content is monitored to comply with the allowable SO2 emission rate. ET-Ohio EPA reserves the option of requiring an emissions test as the primary method of determining compliance. Otherwise, compliance is based on record keeping and reporting.

B001, B002, and B003	Combined SO2 emissions of 828 lbs/day (daily avg) from B001, B002 and B003		40 CFR 52	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-Permittee shall demonstrate compliance through daily average emission calculations from B001, B002 and B003. Emission testing is not necessary due to the restriction of these boilers to natural gas, No. 6 fuel oil and blast furnace gas.
B001, B002, B003 and B004	Combined SO2 emissions of 1258 lbs/day (daily avg) from B001, B002, B003 and B004		40 CFR 52	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-Permittee shall demonstrate compliance through daily average emission calculations from B001, B002, B003 and B004. Emission testing is not necessary due to the restriction of these boilers to natural gas, No. 6 fuel oil and blast furnace gas.
B001, B002, B003, B004, B005, B006 and B007	Combined SO2 emissions of 1958 lbs/day (daily avg) from B001, B002, B003, B004, B005, B006 and B007		40 CFR 52	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-Permittee shall demonstrate compliance through daily average emission calculations from B001, B002, B003, B004, B005, B006 and B007.
B004 and B007	0.040 lb/mmBtu PE, except when burning coal	17-10 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	OR-The quality of coal burned shall meet certain specifications on dry basis. An ESP and COM shall be operated when burning coal. M, R, & Rp are included. CAM is currently not applicable. M-The quality of coal will be monitored to ensure it meets specifications for an acceptable byproduct of combustion. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements
B004 and B007	0.13 lb/mmBtu PE when burning coal	17-10 (C)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The quality of coal burned shall meet certain specifications on dry basis. An ESP and COM shall be operated when burning coal. M, R, & Rp are included. CAM is currently not applicable. M-The quality of coal will be monitored to ensure it meets specifications for an acceptable byproduct of combustion.

B004	2.45 lbs/mmBtu SO2 emissions. 1056 lbs/hr daily avg SO2 emissions	18-24 (N)(2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of coal burned shall meet certain specifications on dry basis. An ESP and COM shall be operated when burning coal. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-The Ohio EPA reserves the option of requiring an emissions test as the primary method of determining compliance. Otherwise, compliance is based on record keeping and reports.
B005 and B006	0.040 lb/mmBtu PE	17-10 (B)(1)		N	Y	N	N	N	N	N	N	N	N	N	OR-The permittee shall only burn natural gas and/or blast furnace gas in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M, R, Rp-No specific means of PM/PM_{10} monitoring required since these EUs are restricted to natural gas and blast furnace gas. ET-The permittee shall demonstrate compliance through AP-42 calculation requirements.
B005 and B006	1.64 lbs/mmBtu SO2 each (daily avg)	18-24 (N)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall only burn natural gas and/or blast furnace gas in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-The permittee shall demonstrate compliance through AP-42 calculation requirements.
B005 and B006	315 lbs/hr SO2 (combined)	18-24 (N)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall only burn natural gas and/or blast furnace gas in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-The permittee shall demonstrate compliance through AP-42 calculation requirements.
B007	2.39 lbs/mmBtu SO2 (daily avg)	18-24 (N)(4)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of coal burned shall meet certain specifications on dry basis. An ESP shall be operated when burning coal. M, R, & Rp are included. CAM is currently not applicable. M-The sulfur content is monitored to comply with the allowable SO2 emission rate. ET-The permittee shall demonstrate compliance through monitoring and record keeping requirements.

B007	686 lbs/hr SO2	18-24 (N)(4)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of coal burned shall meet certain specifications on dry basis. An ESP shall be operated when burning coal. M, R, & Rp are included. CAM is currently not applicable. M-SO2 emissions are calculated and recorded to determine compliance with emission limitation. ET-The permittee shall demonstrate compliance through monitoring and record keeping requirements.
F001	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 22.
F001	5% opacity IAW 17-03(B)(3) for eastside paved and unpaved roads and parking areas	17-12 (P)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements.
F001	5% opacity IAW 17-03(B)(3) for westside paved and unpaved roads and parking areas	17-12 (O)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirement.
F003	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F003	20% opacity as a 3-minute avg (fugitive)	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F010	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to comply with RACM ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

F010	20% opacity as a 3-minute avg (fugitive)	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F010	5% opacity as a 6-minute avg for coke handling, screening and conveying system	17-12 (P)(5)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F011	20% opacity as a 6-minute avg from any stack	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall maintain a pressure drop across the baghouse within the range of 2-4 inches of water while in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor opacity via continuous opacity monitor, VE checks and daily records of the pressure drop across the baghouse. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F011	20% opacity as a 3-minute average (fugitive)	17-07 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F011	RACM to eliminate fugitive dust	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall maintain a pressure drop across the baghouse within the range of 2-4 inches of water while in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall record pressure drop across the baghouse and perform VE checks daily. ET-No emission testing is required.
F011	10.3 lbs/hr PE from secondary emission control baghouse serving P905, P906, F011 and F013	17-12 (P)(6)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall maintain a pressure drop across the baghouse within the range of 2-4 inches of water while in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall record pressure drop and perform VE checks daily.
F011	0.01 gr/dscf of PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall maintain a pressure drop across the baghouse within the range of 2-4 inches of water while in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall record pressure drop and perform VE checks daily.

F011	1144 lbs/hr SO2	18-06 (E)(1)		N	N	N	N	N	N	N	N	N	N	N	CAM is currently not applicable. M, R, Rp, ET-The potential SO2 emissions are less that the allowable. Therefore, no monitoring, record keeping, reporting or compliance measures are necessary.
F012	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F012	20% opacity as a 3-minute avg (fugitive)	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F016	RACM to eliminate fugitive dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum coke unloaded not to exceed 4100 tons/day. Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements.
F016	20% opacity as a 3-minute average (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum coke unloaded not to exceed 4100 tons/day. Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements.
F016	0.02 lb/mmBtu PE	17-10		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum coke unloaded not to exceed 4100 tons/day. Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M & R are not included. Rp is included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET - Not needed for inherently clean fuel.

F016	5% opacity as a 6-minute avg		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum coke unloaded not to exceed 4100 tons/day. Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F016	0.9 lb/hr PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-Not needed for use of inherently clean fuels.
F016	0.56 lb/hr PM10 emission rate		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-Not needed for use of inherently clean fuels.
F016	3.1 lb/hr NOx emissions		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-Not needed for use of inherently clean fuels.
F016	0.1 lb/mmBtu NOx emissiosn		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maximum coke unloaded not to exceed 4100 tons/day. Maximum natural gas usage rate shall not exceed 118 mmft3 based on a rolling 12-month summation. M, R & RP are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-Not needed for use of inherently clean fuels.
F017	20% opacity as a 3-minute avg	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F017	RACM to eliminate fugitive dust		31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

F202	20% opacity as a 3-minute avg (fugitive)	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F202	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F204	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F204	5% opacity as a 6-minute avg for fugitive dust	17-12 (O)(4)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F209	20% opacity as a 6-minute avg (stack)	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation. CAM is currently not applicable. M-The permittee shall perform daily VE checks and record pressure drop daily. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F209	20% opacity as a 6-minute avg (fugitive)	17-07 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F209	RACM to eliminte fugitive dust	17-08 (B)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET - The permittee shall demonstrate compliance through record keeping requirements.
F209	21.0 lbs/hr PE from baghouse serving F009	17-12 (O)(2) & (3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the baghouse shall be maintained within the range of 2-4 inches of water while the emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.

F209	5% opacity		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-There shall be no visible emissions of an opacity equal to or greater than 5% from any of the fourteen (14) baghouse stacks while desulfurization is in progress. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall perform daily VE checks and record pressure drop daily. ET-Compliance shall be based on Test Method 9 and the methods and procedures specified in OAC rule OAC rule 3745-17-03(B)(1).
F209	753 lbs/hr SO2 emissions	18-06 (E)(1)		N	Y	Y	N	N	Y	N	N	N	N	N	OR-The process of desulfurization shall not be carried out during transfer of the hot metal and not at the transfer station unless at least 12 of the 14 compartment systems are maintained and are operating in satisfactory condition. M & R are included. CAM is currently not applicable. M-The permittee shall maintain records on desulfurization operations. **Rp & ET are currently not addressed.**
F210	20% opacity as a 3-minute avg (fugitive)	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-Monitor and record the frequency of inspections to determine if control measures are needed. ET-Compliance shall be based on Test Method 9 and the methods and procedures specified in OAC rule OAC rule 3745-17-03(B)(3).
F210	RACM to eliminate fugitive dust	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET-The permittee shall demonstrate compliance through record keeping requirements.
P002	20% opacity as a 6-minute avg (stack)	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The scrubber water flow rate shall be continuously maintained at a value of not less than the minimum water flow rate recommended by the manufacturer to ensure proper operation at all times. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the scrubber water flow rate daily. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P002	0.551 lb/hr PE	17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	Less stringent than 31-05 (A)(3); Appears to be an error in the permit.

P002	0.115 lb/hr PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The scrubber water flow rate shall be continuously maintained at a value of not less than the minimum water flow rate recommended by the manufacturer to ensure proper operation at all times. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the scrubber water flow rate daily. ET-Compliance shall be determined using OAC rule 3745-17-03(B)(10). No specific means of testing is required, but may be required pursuant to OAC rule 3745-15-04(A).
P004	0.551 lb/hr PE	17-11 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	Less stringent than 31-05 (A)(3); Appears to be an error in the permit.
P004	20% opacity as a 6-minute avg (stack)	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform weekly VE checks. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P004	0.36 lb/hr PE		31-05 (A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform weekly VE checks. ET-Compliance shall be determined using OAC rule 3745-17-03(B)(10). No specific means of testing is required, but may be required pursuant to OAC rule 3745-15-04(A).
P004	1.56 TPY PE		31-05 (A)(3)	N	N	Y	N	N	Y	N	N	N	N	N	CAM is currently not applicable. M-The permittee shall perform weekly VE checks. ET-None currently provided.
P046	20% opacity as a 6-minute avg	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P046	19.8 lbs/hr PE	17-11		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.
P046	1.26 lbs/mmBtu SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel. ET-Compliance shall be based upon analytical results of each shipment of oil, using the basis explained in OAC rule 3745-18-24 (N)(5).

P046	386 lb/hr SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel oil. ET-None currently provided
P047	20% opacity as a 6-minute avg	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P047	19.8 lbs/hr PE	17-11 (B)(6)		N	N	N	N	N	N	N	N	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.
P047	1.26 lbs/mmBtu SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel. ET-Compliance shall be based upon analytical results of each shipment of oil, using the basis explained in OAC rule 3745-18-24 (N)(5).
P047	386 lbs/hr SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel oil. ET-None currently provided
P048	20% opacity as a 6-minute avg	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P048	19.8 lbs/hr PE	17-11 (B)(6)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.
P048	1.26 lbs/mmBtu SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel. ET-Compliance shall be based upon analytical results of each shipment of oil, using the basis explained in OAC rule 3745-18-24 (N)(5).

P048	386 lbs/hr SO2	18-24 (N)(5)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The quality of oil burned shall meet certain specifications on an as-received basis. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel and sulfur content of fuel oil. ET-None currently provided
P049	20% opacity as a 6-minute avg	17-07		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P049	10.0 lbs/hr PE	17-11		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.
P049	0.024 lbs/mmBtu SO2	18-24 (N)(6)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-This appears to be an error in the permit.
P050	20% opacity as a 6-minute avg	17-07		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P050	10.0 lbs/hr PE	17-11		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.
P050	0.024 lbs/mmBtu SO2	18-24 (N)(6)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuel. ET-This appears to be an error in the permit.
P051	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate a wet scrubber and maintain a scrubber makeup water flow rate based on compliance testing. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

P051	HCL conc. in excess of 18 ppm by volume or an HCL emisison rate that corresponds to a collection efficiency of less than 97 percent.		40 CFR 63 Sub-part CCC	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall maintain and operate the emission source pursuant to the requirements of 40 CFR 63, Subpart A (Section 63.6(e)(3)). M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber and perform inspections semiannually on the closed vent system and scrubber.
P068	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance with the visible PE limitations shall be determined by the methods in OAC rule 3745-17-03 (B)(3).
P068	Good operating practices-RACM	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. ET-Compliance shall be based upon the record keeping requirements. M-The permittee shall perform daily VE checks.
P068	20% opacity as a 6-minute avg (fugitive)	17-07 (A)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance with the visible PE limitations shall be determined by the methods in OAC rule 3745-17-03 (B)(3).
P068	66.78 lbs/hr PE from continuous casting machine	17-11 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be demonstrated using engineering calculations and emission factors from RACM 2.2.3-1. If testing is required, testing shall be conducted using Test Method 5 of 40 CFR 60, Appendix A.
P068	Good operating practices-RACM	17-08 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be based upon the record keeping requirements.
P071	20% opacity as a 6-minute avg	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9 and the procedures specified in OAC 3745-17-03 (B)(1).
P071	0.020 lb/mmBtu PE	17-10 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall burn only natural gas in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels. ET-Permittee shall demonstrate compliance through AP-42 calculation requirements.

P071	0.4 lb/mmBtu NOx or 1.2 times the actual rate		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall burn only natural gas in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels.
P072	75.67 lbs/hr PE	17-11 (A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Less stringent than BAT
P072	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (149,510 ACFM Cantech) baghouse control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P072	20% opacity as a 3-minute avg	17-07 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (149,510 ACFM Cantech) baghouse control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P072	RACM to eliminate fugitive emissions	17-08 (B)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P072	0.0052 gr/dscf PE of exhaust gas		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (149,510 ACFM Cantech) baghouse control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P072	10.5 TPY PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the (149,510 ACFM Cantech) baghouse control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse. ET-Compliance is determined using the emission factor from the stack test.
P073	20% opacity as a 6-minute avg	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	Less stringent than BAT
P073	20% opacity as a 3-minute avg	17-07 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the scrubber control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.

P073	Control efficiency of equipment sufficient to minimize or eliminate visible PE or dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the scrubber control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.
P073	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the scrubber control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.
P073	68.95 lb/hr PE	17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the scrubber control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.
P073	BACT to minimize CO emissions	21-08		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the 2-stage gas burner flare control system to control CO emissions whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the pilot flame. ET-Compliance shall be shown when permittee demonstrates compliance with lb/hr CO emissions.
P073	5% opacity as a 6-minute avg		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the scrubber control system to control PE whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.
P073	15 lbs/hr CO		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the 2-stage gas burner flare control system to control CO emissions whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the pilot flame.

P073	2-stage gas burner flare system shall achieve a min. of 98% by wt. reduction of any CO gases		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the 2-stage gas burner flare control system to control CO emissions whenever this emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the pilot flame.
P074	0.01 gr/dscf PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse and perform daily VE checks. ET-If necessary, compliance will be determined using Method 5.
P074	1.03 lb/hr PE based on 12,000 dscf/min of exhaust gases		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse and perform daily VE checks. ET-If necessary, compliance will be determined using Method 5.
P074	4.51 TPY PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse. ET-None currently provided.
P074	20% opacity as a 6-minute avg	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the pressure drop and perform daily VE checks. ET-Compliance will be determined through record keeping and method 9, if necessary.
P076	4.0 lbs/hr PE	17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 3.0 inches of water at all times while the emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.

P076	20% opacity as a 6-minute avg (stack)	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 3.0 inches of water at all times while the emissions unit is in operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the scrubber.
P265	20% opacity as a 6-minute avg	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall burn only natural gas in this emissions unit. The EU shall be limited to a max usage of 2.2 billion ft3 of natural gas per rolling 365-day period. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels.
P265	0.02 lb/mmBtu PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall burn only natural gas in this emissions unit. The EU shall be limited to a max usage of 2.2 billion ft3 of natural gas per rolling 365-day period. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels.
P265	0.4 lb/mmBtu NOx or 1.2 times the actual heat input rate as determined by testing (NOx)		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall burn only natural gas in this emissions unit. The EU shall be limited to a max usage of 2.2 billion ft3 of natural gas per rolling 365-day period. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the use of inherently clean fuels.
P266	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be demonstrated by the methods outlined in OAC rule 3745-17-03 (B)(3).
P266	RACM to eliminate fugitive dust	17-08 (B)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be determined through record keeping requirements.
P266	Maintain good operating practices for the torch cutting operation to minimize or eliminate fugitive dust	17-07 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be determined through record keeping requirements.
P266	20% opacity as a 6-minute avg (stack)	17-07 (A)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be demonstrated by the methods outlined in OAC rule 3745-17-03 (B)(1).

P266	58.72 lbs/hr PE from continuous casting machine	17-11 (B)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall perform daily VE checks. ET-Compliance shall be demonstrated through engineering calculations and emission factors from RACM 2.2.3-1. If testing is required then testing shall be conducted using Test Method 5 of 40 CFR 60, Appendix A.
P267	61.77 lbs/hr PE	17-11 (A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Less stringent than BAT
P267	20% opacity as a 6-minute avg	17-07		N	Y	Y	N	N	Y	N	Y	N	Y	N	Less stringent than BAT
P267	20% opacity as a 3-minute avg	17-07 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (Wheelabrator) baghouse control system to control PE whenever this unit is in operation. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P267	0.0052 gr/dscf PE from exhaust gases		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (Wheelabrator) baghouse control system to control PE whenever this unit is in operation. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P267	4.51 lb/hr PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (Wheelabrator) baghouse control system to control PE whenever this unit is in operation. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P267	5% opacity as a 6-minute avg		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (Wheelabrator) baghouse control system to control PE whenever this unit is in operation. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.

P267	The baghouse shall be operated at a sufficient volume flow rate to capture all visible emissions generated by this emissions unit.		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the (Wheelabrator) baghouse control system to control PE whenever this unit is in operation. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, until a pressure drop range that is more representative of actual operating conditions can be established. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P268	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P268	20% opacity as a 3-minute avg	17-07 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P268	Control efficiency of equipment sufficient to minimize or eliminate visible PE or dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse to comply with the VE limitation.
P268	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.

P268	30.51 lbs/hr PE	17-11 (A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P268	The baghouse shall be operated at a sufficient volume flow rate to capture all visible fugitive particulate emissions generated by this emissions unit; considered adequate if visible PE do not exceed 20% opacity as a 3-minute avg		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the baghouse control system to control PE whenever this emissions unit is in operation. The pressure drop across the baghouse unit shall be maintained within a range established either during the most recent emission test or by the manufacturer's written recommendation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation of the baghouse.
P269	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the wet scrubber while this emissions unit is in operation and shall maintain a minimum scrubber makeup water flow rate that is based on the average of the values recorded during any of hte test runs during which compliance was demonstrated. The permittee shall provide and operate a closed vent system for each vessel Loading and unloading shall be conducted either through enclosed lines OR each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device. CAM is currently not applicable. M-The permittee shall monitor the water flow rate of the scrubber. M, R, & Rp are included. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

P269	HCL conc. in excess of 18 ppm by volume or an HCL emisison rate that corresponds to a collection efficiency of less than 97 percent.		40 CFR 63 Sub-part CCC	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate and maintain each affected emissions source, including associated air pollution control equipment, in a manner consistent with 40 CFR 63, Subpart A (Section 63.6(e)). M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber and perform periodic inspections of the scrubber.
P269	0.204 lb/hr HCL		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate and maintain each affected emissions source, including associated air pollution control equipment, in a manner consistent with 40 CFR 63, Subpart A (Section 63.6(e)). M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber and perform periodic inspections of the scrubber.
P903	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor slag runner cover use and complete VE readings to ensure compliance with the opacity limitation. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P903	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings to ensure compliance with the opacity limitation and monitor slag runner cover use. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P903	Installation/use of hoods to minimize visible PE of fugitive dust	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P903	67.39 lbs/hr PE	17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use.

P903	20% opacity as a 6-minute avg	17-07 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor slag runner cover use and complete VE readings to ensure compliance with the opacity limitation. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P903	0.04 lb/mmBtu PE	17-10 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use.
P903	11.7 lbs/hr PE	17-12 (P)(5)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use.
P903	0.15 lb/mmBtu SO2		40 CFR 52	N	N	N	N	N	N	N	N	N	Y	N	CAM is currently not applicable. M, R & Rp-None currently provided.
P903	3.14 lb/hr PE		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use.
P903	Passive Emission Suppression system shall be maintained/operated during each cast to minimize or eliminate visible fugitive dust		31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use ET-Compliance shall be determined through PM emission testing.
P903	Visible PE from the cast house shall not exceed 15% opacity on a six-minute rolling avg basis*	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall complete VE readings to ensure compliance with the opacity limitation. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9. *except for the six-minute periods which include the tap hole drilling or plugging operation or oxygen lancing operation, which shall not exceed 20% opacity on a six-minute rolling avg basis provided that the times these operations took place are recorded and a summary is available for reviewing during normal business hours.

P904	20% opacity as a 6-minute avg	17-07 (A)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor slag runner cover use and complete VE readings. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P904	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings and monitor slag runner cover use. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P904	Installation/use of hoods to minimize visible PE of fugitive dust	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P904	67.03 lbs/hr PE	17-11		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor slag runner cover use.
P904	20% opacity as a 6-minute avg	17-07 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor slag cover runner use. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P904	0.04 lb/mmBtu PE	17-10 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-Th e permittee shall monitor slag runner cover use.
P904	11.7 lbs/hr PE	17-12 (P)(5)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The Passive Emission Suppression system shall be used to control PE generated by the cast house operation. M, R, & Rp are included. CAM is currently not applicable. M-Th e permittee shall monitor slag runner cover use.
P904	0.15 lb/mmBtu SO2		40 CFR 52	N	N	N	N	N	N	N	N	N	Y	N	CAM is currently not applicable. M, R & Rp-None currently provided.

P905	20% opacity as a 6-minute avg from the suppressed combustion system venturi scrubber stack	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor scrubber parameters. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P905	15.0 lbs/hr PE from the suppressed combustion system venturi scrubber stack	17-12 (P)(10)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber.
P905	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings for four consecutive heats per week. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

P905	RACM to minimize or eliminate fugitive dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor scrubber parameters and perform VE readings weekly. ET-Compliance shall be determined through record keeping requirements.
P905	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber.
P906	20% opacity as a 6-minute avg from the suppressed combustion system venturi scrubber stack	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor scrubber parameters daily. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

P906	15.0 lbs/hr PE from the suppressed combustion system venturi scrubber stack	17-12 (P)(10)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber. ET-Compliance determined from mass balance calculations. Method 5 test performed if required.
P906	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings for four consecutive heats per week. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P906	RACM to minimize or eliminate fugitive dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor scrubber parameters and perform VE readings weekly. ET-Compliance shall be determined through record keeping requirements.

P906	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The pressure drop across the venturi scrubber shall be continuously maintained at all times while the emissions unit is in operation in the range of pressure drops recorded during the last performance test that demonstrated compliance. The scrubber flow rate shall be continuously maintained at a value of not less than that of the scrubber water flow rates recorded during the last performance test that demonstrated compliance. The exhaust gas flow rate shall be continuously maintained at a value of not less than that recorded during the last performance test that demonstrated compliance. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor the operation and water flow rate of the scrubber. ET-None currently provided.
P923	20% opacity as a 3-minute avg	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will perform VE readings monthly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P923	20% opacity as a 6-minute avg (fugitive from cast houses)	17-07 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings monthly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P923	20% opacity as a 6-minute avg (stack)	17-7 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will perform VE readings monthly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P923	RACM to minimize or eliminate visible fugitive dust	17-08 (B)(3)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall perform VE readings monthly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P923	11.2 lbs/hr PE	17-12 (O)(4)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will perform VE readings monthly.

P923	0.024 lb/mmBtu SO2		40 CFR 52	N	N	Y	N	N	Y	N	Y	N	Y	N	OR-The PEC system shall be used to control PE generated by cast house operations. M, R, & Rp are included. CAM is currently not applicable. M-Monitor and analyze fuel used.
P925	20% opacity as a 6-minute avg from the ESP stack	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor opacity with a continuous opacity monitor. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P925	39.8 lbs/hr PE (combined) from the two ESP stacks serving EUs P925 and P926	17-12 (O)(10)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor ESP parameters hourly.
P925	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings for four consecutive heats per week. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

P925	RACM to minimize or eliminate fugitive dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor ESP parameters and perform VE checks weekly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P925	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor ESP parameters hourly.
P926	20% opacity as a 6-minute avg from the ESP stack	17-07 (A)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor opacity with a continuous opacity monitor. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P926	39.8 lbs/hr PE (combined) from the two ESP stacks serving EUs P925 and P926	17-12 (O)(10)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor ESP parameters hourly.

P926	20% opacity as a 3-minute avg (fugitive)	17-07 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will complete VE readings for four consecutive heats per week. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P926	RACM to minimize or eliminate fugitive dust	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor ESP parameters and perform VE readings weekly. ET-The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
P926	Control equipment achieve an outlet emission rate of not greater than 0.030 gr/dscf of PE or there are no visible PE, whichever is less stringent	17-08 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall operate the ESP at all times while this emissions unit is in operation. The avg total combined power input to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour avg, during the most recent emissions test that demonstrated the emissions unit was in compliance with the PE limitation. M, R, & Rp are included. CAM is currently not applicable. M-The permittee will monitor ESP parameters hourly.
Z007	Exempt	21-07 (G)(2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), shall not be used in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor and record the types and amounts of materials used to prove compliance with OAC rule 21-07(G)(2). ET-Compliance shall be determined through record keeping requirements.

Z009	Exempt	21-07 (G)(2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), shall not be used in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor and record the types and amounts of materials used to prove compliance with OAC rule 21-07(G)(2). ET-Compliance shall be determined through record keeping requirements.
Z010	Exempt	21-07 (G)(2)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), shall not be used in this emissions unit. M, R, & Rp are included. CAM is currently not applicable. M-The permittee shall monitor and record the types and amounts of materials used to prove compliance with OAC rule 21-07(G)(2). ET-Compliance shall be determined through record keeping requirements.

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

? **Instructions for Part III:**

? 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.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.