

Statement of Basis For Title V Permit

Part I - General	
Company Name	DiGeronimo Aggregates LLC
Premise Number	1318270383
What makes this facility a Title V facility?	PM, SO ₂ , NO _x and CO
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	There are no "common control" issues associated with this facility.
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)	Minor Mod request dated 03/24.2006.: The permittee replaced the dry sodium bicarbonate injection system with a wet lime injection system to control SO ₂ emissions and to begin to burn coal. The switch from dry sodium bicarbonate injection system to a wet lime injection system was insignificant and did not need a PTI. This is now the Title V renewal permit, since it is 5 years after the issuance date of 5/29/2002.
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)	Significant Mod request dated 12/17/2005: The permittee submitted Title V permit renewal application and requested permission to burn coal in P901. Earlier, PTI #13-03987 was issued on 3/13/2003 to install new shale crushing, conveying and screening system (non-insignificant EU P012) to replace existing system (non-insignificant EU P902). PTI #13-04605 (significant modification) was issued on 8/29/2006 for a Chapter 31 modification to burn coal as primary fuel in rotary kiln (P901) and to install coal handling equipment. This is now the Title V renewal permit, since it is 5 years after the issuance date of 5/29/2002.
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)	The renewal permit will contain the following changes: 1. The dry sodium bicarbonate injection system has been replaced by a lime-slurry injection system. 2. Non-insignificant EU P902 has been deleted from the permit. 3. Non-insignificant EU P012 has been added to the permit. 4. All requirements from PTIs Nos. 13-03987 and 13-04605 have been incorporated into the new Title V permit. 5. PTI #13-04605 has permitted the facility to install coal handling equipment and to burn coal.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Part II.A.1	N	40 CFR 64	CAM clarification
Part II.B.1	15-05	N	List of insignificant emissions units.

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		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
F001	No VE's except for 13 mins during any hour	17-07 (B)(5)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor and record the frequency of inspections to determine if control measures are needed. ET - Permittee shall perform inspections and maintain records.
F001	RACM to eliminate fugitive dust	17-08 (B)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor and record the frequency of inspections to determine if control measures are needed. ET - not required for RACM.
F002	Emission rate not greater than 0.03 gr/dscf or no VEs from baghouse stack	17-08(B)(3)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Permittee shall perform visible emission checks. Appropriate M, R, & Rp requirements have been specified. CAM does not apply. ET - Permittee shall perform VE checks and maintain records.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
F002	RACM	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	F002: Drilling operations w/ cyclone and baghouse F002: Material transfer operations. F002: Open Pit Blasting - Exempt pursuant to 17-07(B)(11)(b) M: The permittee shall perform visible emissions checks. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: not required for RACM.
F002	20% opacity as a 3-minute average	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	F002: Drilling operations w/ cyclone and baghouse F002: Material transfer operations. F002: Open Pit Blasting - Exempt pursuant to 17-07(B)(11)(b) M: The permittee shall perform visible emissions checks. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET - Permittee shall perform VE checks and maintain records.
F003	No visible emissions except for 13 minutes in any hour	17-07(B)(6)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor and record the frequency of inspections to determine if control measures are needed. ET - Permittee shall perform inspections and maintain records.
F003	RACM for storage piles	17-08(B)(6)	N	N	N	Y	N	N	Y	N	Y	N	N	N	F003: load-in, load-out of storage piles F003: wind erosion from storage piles M - Monitor and record the frequency of inspections to comply with RACM. ET - not required for RACM.
F004	20% opacity as a 3-minute average	17-07(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor and record the frequency of inspections to determine if controls are needed. ET - Permittee shall perform inspections and maintain records.
F004	RACM to eliminate fugitive dust	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M - Monitor and record the frequency of inspections to determine if control measures are needed. ET - not required for RACM.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P012	Belt Conveying Activity: 0.60 lbPE/hr; 0.38 tpy PE 0.29 lb PM ₁₀ /hr; 0.18 tpy PM ₁₀	N	31-05 (A)(3) PTI 13- 03987	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material conveying rates. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: Compliance demonstrated by calculations using equations and best available emission factors.
P012	Best available control measures sufficient to minimize or eliminate visible emissions of fugitive dust. Compliance with 40 CFR Part 60, Subpart 000.	N	31-05 (A)(3) PTI 13- 03987	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. M - Monitor and record the frequency of inspections to determine if control measures are needed. ET - not required for RACM.
P012	Belt Conveying Activity: 10% opacity as a 3-minute average fugitive emissions	N	40 CFR Part 60, Subpa rt 000.	N	N	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material conveying rates. M - Monitor and record the frequency of inspections to determine if controls are needed. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: Permittee shall perform inspections and maintain records.
P012	Belt Conveying Activity	17-07 (B) (1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The visible fugitive emission limitation specified by this rule is less stringent than the visible fugitive emission limitation established pursuant to 40 CFR 60, Subpart 000.
P012	Belt Conveying Activity	17-08 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The requirements specified by this rule are equivalent to the requirements established pursuant to OAC rule 3745- 31-05(A)(3).
P012	Front Loading to Grizzly Feeder Activity: 0.0050 lbPE/hr; 0.023 tpy PE 0.0024 lb PM ₁₀ /hr; 0.011 tpy PM ₁₀	N	31-05 (A)(3) PTI 13- 03987	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material loading rates. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: Compliance demonstrated by calculations using equations and best available emission factors.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P012	Front Loading to Grizzly Feeder Activity: No emission limit	N	40 CFR Part 60, Subpart 000	N	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. Since there is no emission limit, M, R,,Rp and ET are not necessary.
P012	Front Loading to Grizzly Feeder Activity: 20% opacity as a 3-minute average	17-07 (B) (1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material loading rates. M - Monitor and record the frequency of inspections to determine if control measures are needed. Appropriate M, R & R requirements have been specified. CAM does not apply. ET:Permittee shall perform inspections and maintain records.
P012	Front Loading to Grizzly Feeder Activity; Grizzly Feeder Activity; 6' x 20' Screening Activity (controlled by a baghouse).	17-08 (B)	PTI 13-03987	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The requirements specified by this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).
P012	Grizzly Feeder Activity: 5.67 lbPE/hr; 2.33 tpy PE 2.7 lb PM ₁₀ /hr; 1.11 tpy PM ₁₀	N	31-05 (A)(3) PTI 13-03987	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing rates. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: Compliance demonstrated by calculations using equations and best available emission factors.
P012	Visible particulate emissions of fugitive dust shall not exceed 15% opacity, as a 3-minute average in: Grizzly Feeder Activity.	N	40 CFR Part 60, Subpart 000	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing rates. M - Monitor and record the frequency of inspections to determine if control measures are needed. Appropriate M, R & Rp requirements have been specified. CAM does not apply. ET: Permittee shall perform inspections and maintain records.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P012	Grizzly Feeder Activity; 6' x 20' Screening Activity (controlled by a baghouse).	17-07 (B) (1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The visible fugitive emission limitation specified by this rule is less stringent than the visible fugitive emission limitation established pursuant to 40 CFR 60, Subpart 000.
P012	6' x 20' Screening Activity (controlled by a baghouse): 4.02 tpy PE (stack) 1.93 tpy PM ₁₀ (stack) 10.12 tpy PE (fugitive) 4.82 tpy PM ₁₀ (fugitive)	N	31-05 (A)(3) PTI 13- 03987	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing rates. Appropriate M, R & Rp requirements have been specified. CAM does not apply. M,R, Rp: Baghouse pressure monitored, recorded daily. Perform visible emissions checks. ET: Compliance demonstrated by calculations using equations and best available emission factors.
P012	6' x 20' Screening Activity (controlled by a baghouse): Baghouse stack emissions shall not exceed 7% as a 6-minute average.	N	40 CFR Part 60, Subpa rt 000	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing rates. Appropriate M, R & Rp requirements have been specified. CAM does not apply. M,R, Rp: Baghouse pressure monitored, recorded daily. Perform visible emissions checks.
P012	6' x 20' Screening Activity Fugitive particulate emissions shall not exceed 10% as a 3-minute average.	N	40 CFR Part 60, Subpa rt 000	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing. Appropriate M, R & Rp requirements have been specified. CAM does not apply. M,R, Rp: Perform inspections to determine if controls are needed.
P012	6' x 20' Screening Activity (controlled by a baghouse): Baghouse stack particulate emissions shall not exceed: 0.05 grams/dscfm or 0.022 gr/dscf.	N	40 CFR Part 60, Subpa rt 000	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-03987 have been transferred. OR: Restrictions on monthly material processing. Appropriate M, R & Rp requirements have been specified. CAM does not apply. M,R, Rp: Baghouse pressure monitored, recorded daily. Perform visible emissions checks.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P012	6' x 20' Screening Activity (controlled by a baghouse)	17-07 (A)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to 40 CFR 60, Subpart 000.
P012	6' x 20' Screening Activity (controlled by a baghouse)	17-11 (A)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-03987 have been transferred. ND - The particulate emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 60, Subpart 000.
P901	45 tons raw shale/hour rotary kiln equipped with new baghouse, lime slurry injection and low-NOx burners, to burn coal as primary fuel and with re-refined used #4 fuel oil and natural gas as backup fuels. PM and PM ₁₀ (filterable plus condensable):32.94 lbs/hr and 122 tpy per rolling, 12-months. NOx: 45 lbs/hr; CO: 41.1 lbs/hr; OC & VOC: 0.50 lb/hr; HCl: 0.44 lb/hr. Coal firing not to exceed 3.69 tons coal/hr.	N	31-05 (A)(3) PTI 13- 04605	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-04605 have been transferred. OR: Restrictions on hourly coal firing rate, sulfur content of coal, baghouse pressure drop, lime slurry injection and on a rolling, 12-month summation of coal firing and shale processing rates. Appropriate M, R & Rp requirements have been specified. CAM is applicable for sulfur dioxide. ET - Permittee shall demonstrate compliance by calculations using best available emission factors and through record keeping and baghouse stack testing.
P901	45 tons shale/hr rotary kiln:	17-07 (A)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-04605 have been transferred. ND - The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to NSPS 40 CFR Supart UUU.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P901	45 tons shale/hr rotary kiln:	17-07 (B) (1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-04605 have been transferred. ND - The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P901	45 tons shale/hr rotary kiln:	17-08 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-04605 have been transferred. ND - The control requirements specified or established by this rule are equivalent to or less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).
P901	45 tons shale/hr rotary kiln:	17-11(B) (1)	N	Y	N	N	N	N	N	N	N	N	N	N	All requirements from PTI #13-04605 have been transferred. ND - The PE limitation specified in this rule is less stringent than the particulate emission limitations established pursuant to 40 CFR Part 60, Subpart UUU and OAC rule 3745-31-05(A)(3).
P901	45 tons shale/hr rotary kiln: Sulfur dioxide emissions from this emissions unit shall not exceed 270.2 lbs/hr.	18-06(E) (1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	All requirements from PTI #13-04605 have been transferred. OR - Coal firing shall not exceed 3.69 tons coal/hour to ensure SO2 compliance; sulfur content of coal; baghouse pressure drop, lime slurry injection. Appropriate M, R, & Rp requirements have been specified. CAM is applicable.
P901	822.5 tons SO2/rolling 12-months; 99.1 tons NOx/rolling 12-months; 90.5 tons CO/rolling 12-months; 1.1 ton OC/VOC/rolling 12-months; and 0.98 ton HCl/rolling 12-months.	N	OAC rule 3745-31-05(C) PTI 13-04605	N	Y	Y	N	N	Y	N	Y	N	N	N	All requirements from PTI #13-04605 have been transferred. Synthetic Minor to avoid Modeling, PSD and Nonattainment NSR. Based on a rolling 12-month summation, the annual coal firing is limited to 16,250 tons and the annual shale processed is limited to 350,000 tons. Appropriate M, R & Rp requirements have been specified. CAM is applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E N F	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P901	PE/PM ₁₀ (filterable) shall not exceed 0.040 gr/dscf; and Visible particulate emissions from the baghouse stack shall not exceed 10% opacity as a 6-minute block average.	N	40 CFR Part 60 Subpart UUU	N	Y	Y	N	N	Y	N	Y	N	Y	Y	All requirements from PTI #13-04605 have been transferred. M - use of certified COMS. R - COMS recording 6-minute average opacity and any deviations of said limit. Rp - quarterly Excess Emission Reports. ET - stack testing within 6 months of full-time switch to coal and no less than every 5 years thereafter. Misc - timely certification and operation of the COMS and installation, certification and operation of a SO ₂ CEM if SO ₂ stack testing shows marginal (>90% of allowable) compliance.
P903	Visible particulate emissions from the multiclone stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.	17-07 (A) (1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Pressure drop across the multiclone shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation. Appropriate M, R & Rp requirements have been specified.
P903	43.6 pounds per hour of particulate emissions from the multiclone stack.	17-11	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - Pressure drop across the multiclone shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation. M - Monitor inlet air flow rate of multiclone. Appropriate M, R & Rp requirements have been specified. CAM is applicable.

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
 2. 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.
5. 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.