

## Statement of Basis For Title V Permit

Company Name	ALCOA - Cleveland Works	
Premise Number	13-18-17-0314	
What makes this facility a Title V facility?	SO2, NOx, PE, CO	
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	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
Emission Offset Policy		Y	Other basis - OAC rule 3745-31-05(A)(3) best available technology and 40 CFR 51, Appendix S, II.A.18, emission offset policy interpretative ruling.  A final permit to install PTI #13-3174 for two 98.8 mmBtu/hr heat input steam generating boilers was issued to Aluminum Company of America’s Cleveland Works on June 20, 1997. The fuel oil usage is restricted to 1,400,000 gallons per year for each boiler. The combined natural gas usage is restricted to 1974.3 million cubic feet per year for both boilers.

### **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.

C If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the3 DAPC decided to resolve them.

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		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
B008 and B009	The fuel oil #2 shall contain no greater than 0.5 weight % of sulfur.		Y	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	Basis: 40 CFR, Part 60, Subpart Dc specifies that the #2 fuel oil shall contain no greater than 0.5 weight percent of sulfur
B008 and B009	20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity when burning fuel oil #2.  PE shall not exceed 0.020 lb /mmBtu of actual heat input	31-05(A)(3) & 31-05(D) PTI 13-3174  17-10(B)(1)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR - The permittee shall use fuel oil #2 that contains no greater than 0.5 weight % of sulfur in this emissions unit. The fuel oil #2 sulfur content limits apply at all times, including periods of startup, shutdown and malfunction. OR - The maximum fuel oil #2 usage for this emissions unit shall be restricted to 1,400,000 gallons per year for each boiler because burning more fuel oil #2 would generate more emissions. OR - The maximum annual natural gas usage of boilers B008 and B009 shall not exceed 1,974.3 million cubic feet, based on a rolling, 12-month summation of the natural gas usage. OR - The permittee shall burn only natural gas or fuel oil #2 in this emissions unit.  M, R, Rp & ET- The permittee shall demonstrate compliance through record keeping requirements. No emissions testing is required. CAM is currently not applicable.  St - M, R, and Rp are similar to the terms and conditions in the permit to install PTI 13-3174 except those one-time terms and conditions which were not included
B008 and B009	No SO2 emission standards when burning natural gas	18-06(D)		Y	Y	Y	Y	N	Y	Y	Y	Y	N	N	Basis: OAC rule 3745-18-06(D) is for burning fuel oil and not natural gas.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
F001 paved roadways and paved parking lots	No visible PE except for 6 minutes during any 60-minute period  Reasonably available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.	17- 07(B)(4)		N	N	Y	N	N	Y	N	Y	N	N	N	ET - The permittee shall demonstrate compliance demonstration through record keeping requirement and method 22. No emission testing is required.
F002 F003 F004 F005 F006 F007 F008 F009 F010 F011 F012 F013 F014 F015 F016 F017 F018 F019 F020 F021 F022 F023 F024	20% opacity, as a 3-minute average	17- 07(B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	Twenty three furnaces.  OR - The permittee shall burn only natural gas in this emissions unit.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
F025 F026	PE shall not exceed 0.020 lb /mmBtu of actual heat input  20 % opacity, as a 3-minute average	17-10(B)		N	Y	Y	N	N	Y	N	Y	N	N	N	Two furnaces  OR - The permittee shall burn only natural gas in this emissions unit.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
F027	20 % opacity, as a 3-minute average	17-07(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 and ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
K002	20 % opacity, as a 6-minute average  0.551 lb/hr of PE	17-07(A)(1)  17-11(B)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall operate the fiberglass filtration system whenever this emissions unit is in operation.  Basis: - based on the allowable paint usage the estimated process weight rate is less than 20 lbs/hr and the estimated uncontrolled PE rate is less than 10 lbs/hr. Therefore the Table I allowable PE rate is 0.551 lb/hr  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
K002	10 gallons of coatings/ hour and 2383 lbs VOC/month  3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied	31-05(A)(3) & 31-05(D) PTI 13-2153  21-09(U)(1)(d)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall operate the fiberglass filtration system whenever this emissions unit is in operation.  M, R, and Rp - Direct tracking of coating usage.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P003 Heat Treat Furnace	PE shall not exceed 0.020 lb /mmBtu of actual heat input.  20 % opacity, as a 3-minute average	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.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
P003 Age Oven	20% opacity as a 3-minute average	17-07(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.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
P004 Heat Treat Furnace	PE shall not exceed 0.020 lb /mmBtu of actual heat input.  20 % opacity, as a 6-minute average	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.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
P004 Age Oven	20% opacity as a 3-minute average	17-07(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.  ET - The permittee shall demonstrate compliance demonstration through record keeping and reporting. No emission testing is required. CAM is currently not applicable.
P007 P008 P009 P010	Less than 10 lbs/hr of PE.  20 % opacity, as a 6-minute average	17-11(B)  17-07(A)(1)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For the four steam hammers  For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P007 P008 P009 P010	3 lbs OC/hr and 15 lbs OC/day  8 lbs OC/hr and 40 lbs OC/day.	21- 09(G)(1)		N	N	Y	N	N	Y	N	Y	N	Y	N	Four steam hammer
P011 P012 P013 P014	Less than 10 lbs/hr of PE.  20 % opacity, as a 6-minute average  3 lbs OC/hr and 15 lbs OC/day.  8 lbs OC/hr and 40 lbs OC/day.	17-11(B)  17- 07(A)(1)  21- 07(G)(1)  21- 07(G)(2)		Y	N	Y	N	?	Y	N	Y	N	Y	N	Four hydraulic presses  For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr
P017 P018 P019	Less than 10 lbs/hr of PE.  20 % opacity, as a 6-minute average  8 lbs OC/hr and 40 lbs OC/day.	17-11(B)  17- 07(A)(1)  21- 07(G)(2)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For the three mechanical presses  For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P024 P029 P030	Less than 10 lbs/hr of PE.  20% opacity, as a 6-minute average  20% opacity, as a 3-minute average	17-11(B)  17-07(A)(1)  17-07(B)(1)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For three hydraulic presses  For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr
P024 P029 P030	3 lbs OC/hr and 15 lbs OC/day.  8 lbs OC/hr and 40 lbs OC/day.	21-07(G)(1)  21-07(G)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	For the three hydraulic presses
P032 acetylene arc system	20% opacity, as a 6-minute average  PE shall not exceed 0.551 lb/hr	17-11(B)  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 2 to 14 inches of water column while the emissions unit is in operation. OR - A regular program of inspection and maintenance shall be performed on the baghouse and its associated ductwork and blower. OR - Material collected by the baghouse shall be handled in such a way there shall be no emission of fugitive dust. Material spilled from the baghouse hoppers or from screw conveyor(s) shall be cleaned up immediately. CAM is currently not applicable.
P046 P047 P048 P049	20% opacity, as a 3-minute average	17-07(B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	Four electric heat treat furnaces
P054 heat treat furnace	0.020 lb PE/mmBtu of actual heat input.  PE shall not exceed 0.551 lb/hr.	17-10(B)(1)  17-11(B) Table I		N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis: OAC rule 3745-17-10(B)(1) applies to the flue exhaust of the furnace.  OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.  OR - Error - No pressure drop range since the emissions unit is not equipped with a baghouse.  Basis: OAC rule 3745-17-11(B) applies to the process exhaust of the furnace.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P054 heat treat furnace	20 % opacity, as a 6-minute average  20% opacity, as a 3-minute average	17- 07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis: OAC rule 3745-17-07(A)(1) applies to the flue exhaust of the furnace.  Basis: OAC rule 3745-17-07(B)(1) applies to the process exhaust of the furnace.
P055 soaking furnace	0.020 lb PE/mmBtu of actual heat input.  PE shall not exceed 0.551 lb/hr.	17- 10(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis: OAC rule 3745-17-10(B)(1) applies to the flue exhaust of the furnace.  OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.  OR - maintain pressure drop range of 2 to 14 inches of water column across the baghouse.  Basis: OAC rule 3745-17-11(B) applies to the process exhaust of the furnace.
P055 soaking furnace	20 % opacity, as a 6-minute average  20% opacity, as a 3-minute average	17- 07(A)(1)		N	N	Y	N	N	Y	N	Y	N	Y	N	Basis: OAC rule 3745-17-07(A)(1) applies to the flue exhaust of the furnace.  Basis: OAC rule 3745-17-07(B)(1) applies to the process exhaust of the furnace.
P083 preheat furnace	20% opacity as a 3- minute average	17- 07(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.
P086 grit blasting machine	20 % opacity, as a 6-minute average  2.20 lbs/hr of PE	17- 07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. OR -A regular program of inspection and maintenance shall be performed on the baghouse and its associated ductwork and blower. OR - Material collected by the baghouse shall be handled in such a way there shall be no emission of fugitive dust. Material spilled from the baghouse hoppers or from screw conveyor(s) shall be cleaned up immediately. CAM is currently not applicable.



EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P104 hydraulic press	20 % opacity, as a 6-minute average  20% opacity, as a 3-minute average	17-07(A)(1)  17-07(B)(1)		N	N	Y	N	N	Y	N	Y	N	Y	N	Basis: OAC 3745-31-05(A)(3) PTI 13-846
P104 hydraulic press	3 lbs OC/hr and 15 lbs OC/day  8 lbs OC/hr and 40 lbs OC/day	21-07(G)(1)  21-07(G)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	
P105 preheat furnace	20% opacity, as a 3-minute average	31-05(A)(3) PTI 13-846		N	N	Y	N	N	Y	N	N	N	N	N	Et - because the requirements of these rules do not apply.
P107 preheat furnace	20% opacity, as a 3-minute average	31-05(A)(3) PTI 13-1216		N	N	N	N	N	N	N	N	N	N	N	Et - because the requirements of these rules do not apply.
P108 shot blast cabinet	20 % opacity, as a 6-minute average  2.91 lbs/hr of PE	17-07(A)(1)  17-11(B) Figure II		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The scrubber water flow rate shall be continuously maintained at a value of not less than 50 gallons per minute at all times while the emissions unit is in operation. OR - A regular program of inspection and maintenance shall be performed on the wet type Rotoclone impaction scrubber and its associated ductwork and blower. CAM is currently not applicable.
P115 P116 P117 P118 P119	20% opacity, as a 3-minute average	17-07(B)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	Five preheat furnaces  OR - The permittee shall burn only natural gas in these emissions units. CAM is currently not applicable.  Et - because the requirements of these rules do not apply.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P121 Indirect Heat Treat Furnace      Direct Heat Oven	PE shall be less than 1.0 ton/yr.      PE shall not exceed 0.020 lb /mmBtu of actual heat input  20 % opacity, as a 6-minute average	31-05(A)(3) PTI 13-1687  17-10(B)(1)  17-07(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.
P122 Direct Heat Treat Furnace      Direct Heat Oven	PE shall be less than 1.0 ton/yr.      PE shall not exceed 0.020 lb /mmBtu of actual heat input  20 % opacity, as a 6-minute average	31-05(A)(3) PTI 13-1687  17-10(B)(1)  17-07(B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.
P125 preheat furnace	Visible PE shall not exceed 5% opacity; PE shall not exceed 0.020 lb/mmBtu	31-05(A)(3) PTI 13-1922		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P126 shot blast room	5% opacity, as 6-minute average and PE shall not exceed 0.01 gr/DSCF and 1.11 lbs/hr.	31-05(A)(3) PTI 13-1922		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 to 14 inches of water column while the emissions unit is in operation except the first hour baghouse operation after start-up in order to build up enough filter cake so that the baghouse will be operating within the recommended pressure drop range while the emissions unit is in operation. OR - A regular program of inspection and maintenance shall be performed on the baghouse and its associated ductwork and blower. OR - Material collected by the baghouse shall be handled in such a way there shall be no emission of fugitive dust. Material spilled from the baghouse hoppers or from screw conveyor(s) shall be cleaned up immediately. CAM is currently not applicable.
P129 mechanical press	Less than 10 lbs/hr of PE.  20 % opacity, as a 6-minute average  8 lbs OC /hr and 40 lbs OC/day	17-11(B)  17-07(A)(1)  21-07(G)(2)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr
P146 hydraulic press	Less than 10 lbs/hr of PE.  20 % opacity, as a 6-minute average  3 lbs OC /hr and 15 lbs OC/day  8 lbs OC /hr and 40 lbs OC/day	17-11(B)  17-07(A)(1)  21-07(G)(1)  21-07(G)(2)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P152 heat treat furnace and age furnace	5 % opacity, as a 6- minute average, PE shall not exceed 0.020 lb/mmBtu and 0.342 lb/hr  0.20 lb NOx/mmBt u and 3.42 lbs NOx/hr	31- 05(A)(3) PTI 13- 2204		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.
P154 preheat furnace	5 % opacity, as a 6- minute average  PE shall not exceed 0.020 lb/mmBtu, 0.372 lb/hr and 1.63 tons/yr  0.05 ton SO2/yr  11.4 tons NOx/yr  2.9 tons CO/yr  0.23 total OC ton/yr.	31- 05(A)(3) PTI 13- 3010		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P155 P156	20 % opacity, as a 6-minute average  5% opacity, as a 6-minute average  PE shall not exceed 1.3 lbs/hr and 0.01 gr/DSCF.  Less than 10 lbs/hr of PE.  3 lbs OC/hr and and 15 lbs OC/day	31-05(A)(3) PTI 13-3067		Y	Y	Y	N	N	Y	N	Y	N	Y	N	For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr  OR - The pressure drop across the baghouse shall be maintained within the range of 4.0 to 8.0 inches of water column while the emissions unit is in operation. CAM is currently not applicable.
P157 P158	20 % opacity, as a 6-minute average  5% opacity, as a 6-minute average  PE shall not exceed 1.3 lbs/hr and 0.01 gr/DSCF.  Less than 10 lbs/hr of PE.  3 lbs OC/hr and 15 lbs OC/day	31-05(A)(3) PTI 13-3149		N	Y	Y	N	N	Y	N	Y	N	Y	N	For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr  OR - The pressure drop across the baghouse shall be maintained within the range of 4.0 to 8.0 inches of water column while the emissions unit is in operation. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P159 preheat furnace	5% opacity, as a 6- minute average  PE shall not exceed 0.29 lb/hr  0.251 lb HF emissions/hr  0.51 NOx emissions/hr	31- 05(A)(3) PTI 13- 3180		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.
P162	5% opacity, as a 6-minute average.  PE shall not exceed 0.41 lb/hr and 1.80 tons per year.	31- 05(A)(3) PTI 13- 3811		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use of natural gas as fuel for emissions unit. CAM not currently applicable. CAM is currently not applicable.  M - when inherently clean fuel is not used and when uncontrolled PE rate exceeds 10 lbs/hr
P162	0.30 lb OC/hr and 1.31 tons OC per year.	31- 05(A)(3) PTI 13- 3811		N	Y	N	N	N	N	N	N	N	Y	N	ET- permittee shall demonstrate compliance through the AP-42 calculation requirements Emission testing is necessary due to sufficiency of the use of emission factors and restricted to the use of natural gas.
P162	4.54 lbs CO/hr and 19.87 tons CO per year.  5.40 lbs NOx/hr and 23.65 tons NOx per year.	31- 05(A)(3) PTI 13- 3811		N	Y	N	N	N	N	N	N	N	Y	N	ET- permittee shall demonstrate compliance through the AP-42 calculation requirements Emission testing is necessary due to sufficiency of the use of emission factors and restricted to the use of natural gas.



EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P165	0.03 grain/DSCF of PE at exhaust air, 1.16 lbs/hr of PE based on 4505 DSCFM and 5.07 tons/year.  7.3 tons OC/year	31-05(A)(3) PTI 13-3882		N	N	Y	N	N	Y	N	Y	N	N	N	ET - The permittee shall demonstrate compliance through record keeping requirements. No emission testing is required.
P165	8 lbs OC/hr and 40 lbs OC/day	21-07(G)(2)		N	N	Y	N	N	Y	N	Y	N	N	N	ET - The permittee shall demonstrate compliance through record keeping requirements. No emission testing is required.
P402 soaking furnace	PE shall not exceed 0.020 lb /mmBtu of actual heat input  PE shall not exceed 46.50 lbs/hr.  20 % opacity, as a 6-minute average	17-10(B)(1)  17-11(B)  17-07(A)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall burn only natural gas in this emissions unit. CAM is currently not applicable.

EU(s)	Limitation	Basis		N D	O R	M	St	E NF	R	St	Rp	St	ET	Mi sc	Comments
		SIP (3745- )	Other												
P429 mechanical press	less than 10 lbs/hr of PE  20% opacity, as a 6-minute average  20% opacity, as a 3-minute average  8 lbs OC/hr and 40 lbs OC/day	17-11(B)  17- 07(A)(1)  17- 08(B)(1)  21- 07(G)(2)		Y	N	Y	N	N	Y	N	Y	N	Y	N	For OAC rule 3745-17-11(B), Figure II does not apply and UMRE is limited to < 10 lbs/hr
P432 acetylene arc system	PE shall not exceed 0.01 gr/DSCF and 3.43 lbs/hr  5% opacity	31- 05(A)(3) PTI 13- 2232		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The pressure drop across the baghouse shall be maintained within the range 2 to 14 inches of water column while the emissions unit is in operation. OR - A regular program of inspection and maintenance shall be performed on the baghouse and its associated ductwork and blower. OR - Material collected by the baghouse shall be handled in such a way there shall be no emission of fugitive dust. Material spilled from the baghouse hoppers or from screw conveyor(s) shall be cleaned up immediately. CAM is currently not applicable. CAM is currently not 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 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.