

# Statement of Basis For Title V Permit

Company Name	BP Chemicals, Inc.	
Premise Number	0302020015 (TVP008)	
What makes this facility a Title V facility?	CO, VOC, NOx, PE, HAPs	
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	
A.1000-A.1017	21-09(DD)	N	
A.2000-A.2009	N	Y	Other-40 CFR 60, Subpart Db To reduce redundancy, this rule was placed in this section.
A.3000-A.3017	N	Y	Other-40 CFR 60, Subpart VV To reduce redundancy, this rule was placed in this section.
A.4000-A.4063	N	Y	Other-40 CFR 63, Subpart F To reduce redundancy, this rule was placed in this section.
A.5000-A.5307	N	Y	Other-40 CFR 63, Subpart G To reduce redundancy, this rule was placed in this section.
A.6000-A.6164	N	Y	Other-40 CFR 63, Subpart H To reduce redundancy, this rule was placed in this section.
A.7000-A.7086	N	Y	Other-40 CFR 63, Subpart JJJ To reduce redundancy, this rule was placed in this section.
A.8000-A.8001	N	Y	Other-40 CFR 63.6(e)(3) To reduce redundancy, this rule was placed in this section.

**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.

<b>Part III (Requirements Within the State &amp; Federally Enforceable Section)</b>															
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												
P011, P035, P039, P043, P065	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M/R-Daily visible emissions (VE) observations provide indication of ongoing compliance. CEMs are not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P038, P069, P075, P078, P905	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Scrubber and/or baghouse parametric monitoring. CAM is not available. M/R-Records of scrubber water pressure supply, water flow rate, pressure drop and/or pH and baghouse pressure drop provide indication of ongoing compliance. COMs are not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P076	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Maintenance of an average total dissolved solids content of 3500 mg/l or less in the cooling water. CAM is not available. M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. COMs are not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

P080, P081	Visible PE shall not exceed 20%, as a 6-minute average, except as provided by rule	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. COMs are not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P048, P074	Exempt	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
N006	None	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P905	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P905	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

N006	None	17-09	N	Y	N	N	N	N	Y	N	Y	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P011	5.96 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P038	6.32 lbs PE/hr	17-11(B)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Scrubber parametric monitoring. CAM is not available. M/R-Records of scrubber water flow rate and pressure drop and daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P039	2.58 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P043	1.73 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P080	36.6 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the appropriate AP-42 emission factor and the maximum TDS are sufficient to show compliance.
P081	49.7 lbs PE/hr	17-11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the appropriate AP-42 emission factor and the maximum TDS are sufficient to show compliance.
P035, P065, P069, P075, P076, P078, P905	None	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P048, P074	Exempt	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(i), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14) does not include gaseous fuels used solely as fuel for the flare as a control device. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
N006	None	18-06	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05. M, R, Rp & ET--There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
J001, J002	None	21-07(E)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of non-photochemically reactive materials (PRMs). CAM is not currently applicable. M/R-Records of the use of PRMs provides indication of ongoing compliance. ET-There are no emissions limitations established pursuant to this rule, therefore, no testing is required.

P006, P009, P010, P011, P043, P048, P051, P052, P062, P065, P067, P068, P069, P074, P075, P079, P801, P803, P804, P805, P806, T001, T015, T019, T023, T024, T025, T026, T027, T028, T032, T033, T034, T071, T073, T079, T080, T081, T082, T084, T088, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T113, T114, T115,	None	21-07(G)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Use of non-PRMs. CAM is not currently applicable. M/R-Records of use of PRMs provides indication of ongoing compliance. ET-There are no emissions limitations established pursuant to this rule, therefore, no testing is required.
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J001, J002, N006, P035, P050, P051, P052, P062, P079, P804, P806, T001, T015, T023, T024, T025, T026, T027, T028, T032, T033, T034, T065, T066, T067, T068, T069, T070, T079, T080, T081, T082, T084, T088, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T113, T114, T115, T116	See rule	21-09(DD)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
P035, P801	See Rule	21-09(EE)	N	N	Y	Y	N	N	Y	N	N	N	N	N	OR-Operational restrictions as required by rule. Rp & ET-This rule does not contain any reporting or emissions testing requirements.

J001	0.1 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 22,500,000 gallons. CAM is not currently applicable. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the appropriate AP-42 emission factor and the maximum throughput are sufficient to show compliance.
J002	Emissions from this process vented to the flare: 0.16 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 4,500,000 gallons. CAM is not currently applicable. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. ET-Calculations based on the appropriate AP-42 emission factor and the maximum throughput are sufficient to show compliance.
J002	No visible flare emissions	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. A COM is not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
N006	57.0 lbs VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
N006	250.0 TPY VOC	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-The TPY limitation is based on the emission unit's potential to emit (PTE) (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.

N006	186.0 lbs CO/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
N006	814.7 TPY CO	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
N006	23.0 lbs NOx/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
N006	102.0 TPY NOx	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
N006	5.0 lbs SO2/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-The hourly limitation is based on the emissions unit's potential to emit (a 99% reduction in the liquid organic streams - 2100 lbs/hr - fed to the incinerator),therefore, no monitoring, recordkeeping, reporting or emissions testing is necessary.
N006	21.90 TPY SO2	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.

N006	0.51 lb PE/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-The hourly limitation is based on the emissions unit's potential to emit ( a 99% reduction in the liquid organic streams - 2100 lbs/hr - fed to the incinerator),therefore, no monitoring, recordkeeping, reporting or emissions testing is necessary.
N006	2.23 TPY PE	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
N006	Visible PE shall not exceed 10% opacity as a 6-minute average	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Scrubber parametric monitoring. CAM is not available. M/R-Records of scrubber water pressure supply and water flow rate provide indication of ongoing compliance. A COM is not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P035	6.0 lbs PE/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P035	26.3 TPY PE	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P035	5736 lbs CO/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 M/R-Continuous emission monitoring data helps ensure compliance with limit.

P035	978.0 tons CO per year, based upon a rolling, 365-day summation of daily emissions	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Continuous emission monitoring data helps ensure compliance with limit. ET-The monitoring and recordkeeping requirements are sufficient to demonstrate compliance.
P035	6614 lbs NOx per rolling 24 hour period	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 M/R-Continuous emission monitoring data helps ensure compliance with limit.
P035	1207.1 TPY NOx	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P035	2.5 lbs SO2/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
P035	11.0 TPY SO2	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R , Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P035	3638 lbs NMHC (as carbon) per rolling 24 hour period	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 M/R-Continuous emission monitoring data helps ensure compliance with limit.
P035	573.0 tons NMHC per year, based upon a rolling, 365-day summation of daily emissions	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Continuous emission monitoring data helps ensure compliance with limit. ET-The monitoring and recordkeeping requirements are sufficient to demonstrate compliance.

P048	1.63 lbs OC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Flare and condenser parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) and records of condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.
P048	7.14 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare and condenser parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) and records of condenser temperature provide indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P062, T068	Less than 1 lb VOC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Incinerator parametric monitoring. CAM is not available. M/R-Records of incinerator combustion temperature provides indication of ongoing compliance. CEMs are not economically justified ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P065	5.20 lbs PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.

P065	3.40 lbs PM10/hr	N	Y	N	Y	Y	N	N	N	N	Y	N	Y	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.
P065	3.8 lbs acrylonitrile/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
P065	3.5 lbs methyl acrylate/hr	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
P065	4.8 lbs VOC/hr as carbon	N	Y	N	N	N	N	N	N	N	N	N	Y	N	Other-OAC 3745-31-05 M, R & Rp-Emissions testing will provide basis for compliance, therefore, no monitoring, recordkeeping or reporting is necessary.
P067	0.12 lb VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Incinerator and condenser parametric monitoring. CAM is not available. M/R-Records of incinerator combustion temperature and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.
P068	0.9 lb VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Scrubber parametric monitoring. CAM is not available. M/R-Scrubber water pressure supply and water flow rate provide indication of ongoing compliance. A CEM is not economically justified.
P069	0.24 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Scrubber parametric monitoring. CAM is not available. M/R-Scrubber water pressure supply and water flow rate provide indication of ongoing compliance. A CEM is not economically justified.

P069	0.052 lb VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Scrubber parametric monitoring. CAM is not available. M/R-Scrubber water pressure supply and water flow rate provide indication of ongoing compliance. A CEM is not economically justified.
P074	3.28 lbs OC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provide indication of ongoing compliance. A CEM is not economically justified.
P074	14.37 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provides indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation.
P075	2.0 lbs PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available. M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.

P075	8.8 TPY PE	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.</p> <p>M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p> <p>ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>
P075	6.0 lbs CO/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.</p> <p>M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p>

P075	26.3 TPY CO	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>
P075	2.0 lbs NOx/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p>

P075	8.8 TPY NO <sub>x</sub>	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>
P075	2.0 lbs SO <sub>2</sub> /hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p>

P075	8.9 TPY SO2	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>
P075	5.0 lbs NMHC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Other-OAC 3745-31-05  OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.  M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p>

P075	21.9 TPY NMHC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05</p> <p>OR-Flare, scrubber, incinerator and/or condenser parametric monitoring. CAM is not available.</p> <p>M/R-Flare, scrubber and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G, scrubber pressure drop and flow rate and condenser temperature provide indication of ongoing compliance. A CEM is not economically justified.</p> <p>ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>
P076	1.40 lbs PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05</p> <p>OR-Maintenance of an average total dissolved solids content of 3500 mg/l or less in the cooling water. CAM is not available.</p> <p>M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. A CEM is not economically justified.</p> <p>ET-Calculations based on maximum TDS and a maximum drift loss factor of 0.004% are sufficient to show compliance.</p>

P076	6.13 TPY PE	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Maintenance of an average total dissolved solids content of 3500 mg/l or less in the cooling water. CAM is not available. M/R-Records of TDS and daily VE observations provide indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P076	0.21 lb VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-The hourly limitation is based on the emissions unit's potential to emit (maximum cooling water throughput capacity of 1,200,000 gallons per hour times a company supplied emission factor of 0.175 lb VOC/1,000,000 gallons),therefore, no monitoring, recordkeeping, reporting or emissions testing is necessary.
P076	0.92 TPY VOC	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.

P077	0.12 lb NH <sub>3</sub> /hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provides indication of ongoing compliance. A CEM is not economically justified. ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to an uncontrolled rate of 5.9 lbs NH <sub>3</sub> /hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.
P077	0.52 TPY NH <sub>3</sub>	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provides indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P077	0.001 lb OC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provides indication of ongoing compliance. A CEM is not economically justified. ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to an uncontrolled rate of 0.065 lb OC/hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.

P077	0.006 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare parametric monitoring. CAM is not available. M/R-Flare monitoring and recordkeeping as required by 40 CFR 63.11(b) provides indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P078	0.31 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Baghouse parametric monitoring. CAM is not available. M/R-Records of baghouse pressure drop provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on a maximum outlet grain loading of 0.01 gr/dscf and maximum flow rates of 2370 dscf for the north baghouse and 1240 dscf for the south baghouse are sufficient to demonstrate compliance.
P078	1.36 TPY PE	N	Y	N	Y	N	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Baghouse parametric monitoring. CAM is not available. M/R-Records of baghouse pressure drop provide indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.

P801	0.04 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to a calculated engineering estimate of flare vent streams and the emissions from the combustion of the natural gas pilot flame flare - emission factor of 0.003 lb PE/mmBtu times the maximum hourly burning capacity of 13 mmBtu/hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.</p>
P801	0.17 TPY PE	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>

P801	7.5 lbs VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05 OR-Flare and incinerator parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.</p> <p>ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to a calculated engineering estimate of flare vent streams). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.</p>
P801	32.85 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05 OR-Flare and incinerator parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.</p> <p>ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>

P801	4.8 lbs CO/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to a calculated engineering estimate of flare vent streams and the emissions from the combustion of the natural gas pilot flame flare - emission factor of 0.37 lb CO/mmBtu times the maximum hourly burning capacity of 13 mmBtu/hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.</p>
P801	21.02 TPY CO	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>

P801	0.88 lb NOx/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to a calculated engineering estimate of flare vent streams and the emissions from the combustion of the natural gas pilot flame flare - emission factor of 0.068 lb NOx/mmBtu times the maximum hourly burning capacity of 13 mmBtu/hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.</p>
P801	3.86 TPY NOx	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>

P801	0.47 lb SO2/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The hourly limitation is based on the emissions unit's potential to emit (a 98% reduction applied to a calculated engineering estimate of flare vent streams and the emissions from the combustion of the natural gas pilot flame flare - emission factor of 0.003 lb SO<sub>2</sub>/mmBtu times the maximum hourly burning capacity of 13 mmBtu/hr). The monitoring and recordkeeping requirements ensure that the flare is operating at the proper efficiency and are sufficient to demonstrate compliance.</p>
P801	2.06 TPY SO2	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	<p>Other-OAC 3745-31-05  OR-Flare and incinerator parametric monitoring. CAM is not available.  M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified.  ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.</p>

P801	No visible flare emissions	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare and incinerator parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 22 readings being conducted.
P801	5.37 TPY fugitive VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare and incinerator parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b), OAC 3745-21-09(DD), 40 CFR, Part 60, Subpart III, 40 CFR, Part 60, Subpart NNN, 40 CFR, Part 60, Subpart RRR and 40 CFR, Part 63, Subpart G provides indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the number of pipe fittings, the appropriate SOCOMI emission factor from EPA-450/3-010 (4/82) and the maximum annual hours of operation are sufficient to show compliance.
P905	0.10 lb PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Baghouse and scrubber parametric monitoring. CAM is not available. M/R-Records of baghouse pressure drop and scrubber water supply pressure and water flow rate provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on applying a 99% control efficiency to an uncontrolled emission rate of 10 lbs/hr are sufficient to show compliance.

P905	0.44 TPY PE	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Baghouse and scrubber parametric monitoring. CAM is not available. M/R-Records of baghouse pressure drop and scrubber water supply pressure and water flow rate provide indication of ongoing compliance. A CEM is not economically justified. ET-The TPY limitation is based on the emissions unit's PTE (maximum hourly emission rate times the maximum annual hours of operation), therefore, if compliance is shown with the hourly emission rate, compliance will also be shown with the annual limitation. Therefore, no monitoring, recordkeeping or reporting is necessary.
P905	1.20 TPY fugitive PE	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. ET-Calculations based on applying a company supplied emission factor of 2.0 lbs/drum by a maximum of 1200 drums/year are sufficient to show compliance.
P905	Visible PE shall not exceed 20% as a 3-minute average	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Daily VE observations provide indication of ongoing compliance. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
T065, T066, T067	8 lbs VOC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Incinerator parametric monitoring. CAM is not available. M/R-Records of incinerator combustion temperature and monthly throughput provide indication of ongoing compliance. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T065, T066, T067	2 lbs acrylonitrile/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Incinerator parametric monitoring. CAM is not available. M/R-Records of incinerator combustion temperature and monthly throughput provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T068	Less than 1 lb VOC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-OAC 3745-31-05 OR-Incinerator parametric monitoring. CAM is not available. M/R-Records of incinerator combustion temperature and monthly throughput provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T069, T070	1219 lbs VOC/yr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T069, T070	341 lbs acrylonitrile/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T071	Less than 100 lbs HC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T073	Less than 250 lbs HC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T079, T080	0.61 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T081, T082	0.1 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T084	0.0368 lb HCN/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare, condenser and scrubber parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b) and records of condenser temperature, scrubber pressure drop and water flow rate and records of monthly throughput provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T084	0.16 TPY HCN	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Flare, condenser and scrubber parametric monitoring. CAM is not available. M/R-Flare and incinerator monitoring and recordkeeping as required by 40 CFR 63.11(b) and records of condenser temperature, scrubber pressure drop and water flow rate and records of monthly throughput provide indication of ongoing compliance. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T088	0.3 TPY formaldehyde	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 M/R-Records of monthly throughput provide indication of ongoing compliance. CEMs are not economically justified ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T093	0.04 lb VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 2,200,00 gallons of product grade acetonitrile or 3,100,00 gallons of crude acetonitrile. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput divided by 8760 hrs/yr are sufficient to show compliance.
T093	0.17 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 2,200,00 gallons of product grade acetonitrile or 3,100,00 gallons of crude acetonitrile. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T094, T095, T096	0.04 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 15,000,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T097	1.26 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 4,500,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T098	0.22 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 4,500,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T099	1.41 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 4,500,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T100	0.99 TPY OC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 5,000,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T101, T102	0.30 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual material throughput shall not exceed 15,000,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T113	0.06 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput of 2,200,00 gallons shall not exceed product grade acetonitrile or 3,100,00 gallons of crude acetonitrile. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T114	0.27 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 3,100,00 gallons of crude acetonitrile, 3,200,00 gallons of crude acrylonitrile, 12,800,000 gallons of formaldehyde or 13,200,000 gallons of methanol. Combined annual maximum throughput of all materials shall not exceed 13,200,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.

T114	0.03 TPY HCN	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 3,100,00 gallons of crude acetonitrile, 3,200,00 gallons of crude acrylonitrile, 12,800,000 gallons of formaldehyde or 13,200,000 gallons of methanol. Combined annual maximum throughput of all materials shall not exceed 13,200,000 gallons. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
T115	0.14 TPY VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-OAC 3745-31-05 OR-Annual throughput shall not exceed 2,200,00 gallons of product grade acetonitrile or 3,100,00 gallons of crude acetonitrile. M/R-Records of throughput indicate compliance by ensuring permittee does not exceed maximum throughput restriction. A CEM is not economically justified. ET-Calculations based on the TANKS 4.0 program and the annual throughput are sufficient to show compliance.
P006, P009, P010, P011, P038, P043, T001	None	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other-OAC 3745-31-05 M, R, Rp & ET-No limits were established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
N006, P035	0.10 lb/mmBtu (expressed as NO <sub>2</sub> )	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart Db OR-Operational restrictions as required by 40 CFR, Part 60, Subpart Db. M/R-Monitoring and recordkeeping as required by rule.

T079, T080, T081, T082, T084, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T113, T114, T115	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart Kb OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
T088, T094, T095, T096, T097, T098, T099, T100, T101, T102	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart VV OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
P035, P801	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart III OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
P048, P074, P075, P801	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart NNN OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
P801	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 60, Subpart RRR OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.

P006, P009, P010, P011, P035, P043, P048, P050, P062, P065, P067, P068, P069, P074, P075, P076, P079, P080, P081, P801, P803, P804, P805, P806, T001, T015, T019, T023, T024, T025, T026, T027, T028, T032, T033, T065, T066, T067, T068, T069, T070, T071, T073, T079, T080, T081, T082, T092, T093, T113, T114, T115, T116	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63.6(e)(3) OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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J002, P048, P052, P074, P075, P077 P079, P801, T034, T084	no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63.11(b)(4) OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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P006, P011, P035, P043, P048, P050, P062, P065, P068, P069, P074, P075, P076, P079, P080, P081, P801, P804, P805, P806, T001, T015, T019, T023, T024, T025, T026, T027, T028, T032, T033, T065, T066, T067, T068, T069, T070, T071, T073, T079, T080, T081, T082, T092, T093, T113, T114, T115,	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63, Subpart F OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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P006, P011, P035, P043, P048, P050, P062, P065, P068, P069, P074, P075, P079, P801, P806, T001, T015, T019, T023, T024, T025, T026, T027, T028, T032, T033, T065, T066, T067, T068, T069, T070, T071, T073, T079, T080, T081, T082, T092, T093, T113, T114, T115, T116	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63, Subpart G OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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P006, P011, P035, P043, P048, P050, P062, P065, P068, P069, P074, P075, P079, P801, P804, P805, P806, T001, T015, T019, T023, T024, T025, T026, T027, T028, T032, T033, T065, T066, T067, T068, T069, T070, T071, T073, T079, T080, T081, T082, T092, T093, T113, T114, T115, T116	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63, Subpart H OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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P006, P009, P010, P011, P043, P065, P067, P068, P069, P803, T001, T019, T071, T073	See Rule	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other-40 CFR 63, Subpart JJJ OR-Operational restrictions as required by rule. M/R-Monitoring and recordkeeping as required by rule.
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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.