

Statement of Basis For Title V Permit

Company Name	Marathon Ashland Petroleum, LLC	
Premise Number	1576 00 0301	
Number of Non-insignificant Emissions Units	108	
What makes this facility a Title V facility?	Potential to Emit over 100 tons/yr. for nitrogen oxides, PM, sulfur oxides, VOC, 25 tons/yr. total HAPs, and 10 tons/yr. individual HAPs	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.I.1, A.I.2.i, and A.I.2.j	N	40 CFR Part 63, Subpart CC	Refinery NESHAP, General Provisions Leak detection and Repair, Wastewater Provisions, Storage Vessels and Miscellaneous Process vents.
A.I.1	21-09(T)	N	State regulations for refinery leak detection and repair. General Provisions
A.I.2.a and A.I.2.b	N	40 CFR Part 63, Subpart A	General Provisions for NESHAP.
A.I.2.c, A.I.2.d and A.I.2.e	N	40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart VV.	Refinery NESHAP Leak Detection and Repair Program, General Provisions. The permittee shall comply with 40 CFR Part 60, Subpart VV LDAR requirements in order to comply with 40 CFR Part 63, Subpart CC.

A.I.2.f and A.I.2.g	N	40 CFR Part 63, Subpart CC and 40 CFR, Part 61, Subpart FF	Refinery and Benzene NESHAP Wastewater Treatment General Provisions The permittee shall comply with the provisions of 40 CFR Part 61, Subpart FF to comply with the Refinery NESHAP.
A.I.2.h	N	40 CFR Part 63, Subpart CC	Refinery NESHAP Storage Vessel, General Provisions
A.I.2.k and A.I.2.l	N	40 CFR Part 63, Subpart CC	Refinery NESHAP, Miscellaneous Process Vents General Provisions
A.II.1 through A.II.5 and A.II.7 through A.II.19	N	40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart VV.	Refinery NESHAP Leak Detection and Repair Program Provisions Operational Restrictions
A.II.6 and A.II.20 through A.II.27	N	40 CFR Part 63, Subpart CC and 40 CFR, Part 61, Subpart FF	Refinery and Benzene NESHAP Wastewater Treatment Provisions Operational Restrictions
A.II.28	21-09(T)	N	State requirements for LDAR around tanks and associated equipment.

A.III.1 through A.III.2	N	40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart VV.	Refinery NESHAP Leak Detection and Repair Program Provisions Monitoring and Record keeping Requirements
A.III.3 through A.III.5	N	40 CFR Part 63, Subpart CC and 40 CFR, Part 61, Subpart FF	Refinery and Benzene NESHAP Wastewater Treatment Provisions Monitoring and Record keeping Requirements
A.III.6	N	40 CFR Part 63, Subpart CC	Refinery NESHAP, Miscellaneous Process Vents Monitoring and Record keeping Requirements
A.III.7	21-09(T)	N	State requirements for monitoring and record keeping requirements for LDAR program.
A.IV.1	N	40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart VV.	Refinery NESHAP Leak Detection and Repair Program Provisions Reporting Requirements
A.IV.2	N	40 CFR Part 63, Subpart CC and 40 CFR, Part 61, Subpart	Refinery and Benzene NESHAP Wastewater Treatment Provisions Reporting Requirements

A.IV.3	N	40 CFR Part 63, Subpart CC	Refinery NESHAP, Miscellaneous Process Vents Reporting Requirements
A.V.1	N	40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart VV.	Refinery NESHAP Leak Detection and Repair Program Provisions Testing Compliance Demonstration Requirements
A.V.2	N	40 CFR Part 63, Subpart CC and 40 CFR, Part 61, Subpart	Refinery and Benzene NESHAP Wastewater Treatment Provisions Testing Compliance Demonstration Requirements
A.V.3	N	40 CFR Part 63, Subpart CC	Refinery NESHAP, Miscellaneous Process Vents Testing Compliance Demonstration Requirements

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B015, B019, B020, B022, B023, B024, B025, and B026	1.0 pound of sulfur dioxide (SO2) per mmBtu of actual heat input 0.19 pound of particulates per mmBtu of actual heat input 20% opacity, as a 6-minute average, except as provided by the rule.	17-10(C)(1) 17-07(A)	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR 52.1881(b)(27)(ix) 3745-18-82 also applies OR - Permittee shall use only permitted fuels. Appropriate MRR have been specified for the OR .

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B016 and B021,	0.025 pound of sulfur dioxide (SO2) per mmBtu of actual heat input 0.19 pound of particulates per mmBtu of actual heat input 20% opacity, as a 6-minute average, except as provided by the rule.	17-10(C)(1) 17-07(A)	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR 52.1881(b)(27)(ix) 3745-18-82 also applies OR - Permittee shall use only permitted fuels. Appropriate MRR have been specified for the OR .
B027, B028, and B029	Restrictions on the amount of hydrogen sulfide(H2S) in the refinery fuel gas burned in this emissions unit (230 mg/dscm(0.10 gr/dscf)) 1.0 pound of sulfur dioxide (SO2) per mmBtu of actual heat input 0.19 pound of particulates per mmBtu of actual heat input 20% opacity, as a 6-minute average, except as provided by the rule.	17-10(C)(1) 17-07(A)	Y Y							Other - 40 CFR 52.1881(b)(27)(ix) and 40 CFR Part 60.104(a)(1) 3745-18-82 also applies OR - Permittee shall use only permitted fuels with restrictions on refinery fuel gas. Appropriate MRR have been specified for the OR .
J001	10 milligrams of total organic compounds per liter of gasoline loaded Use of a vapor collection and processing system to collect all organic compound vapors displaced during cargo tank loading. General Provisions for 40 CFR Part 63 State requirements for control measures for gasoline loading racks. BAT requirements found in PTI 15-384.	N N N 21-09(Q) N	Y Y Y N Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart R Other - 40 CFR Part 63, Subpart R Other - 40 CFR Part 63, Subpart A Control measures and restrictions specified in 21-09(Q) are less stringent than those specified in 40 CFR Part 63, Subpart R. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subparts A and R.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P002	0.62 pound of sulfur dioxide/1000 pounds of fresh feed	N	Y	Y	Y	Y	Y	Y	Y	Other - 40 CFR Part 52.1881(b)(27)(ix) Other - 40 CFR Part 63.648 (Subpart CC) OR - Regenerator shall operate in total burn mode to convert CO to Carbon dioxide - Catalyst cooler shall be operated when regenerator operates to maintain catalyst integrity and minimize PM - Maintain cold catalyst feed rate in excess of 0.15 tons/hr. to provide adequate catalyst and maintain conversion reactions - Operate a flare to combust vented gases from P002 during emergency operation - Addition of sulfur catalyzing compound to crude feed to maintain SO2 emissions at allowable emission rate Appropriate MRR have been specified for the OR listed in this permit.
	Compliance with LDAR Program as specified in 40 CFR Part 63, Subpart CC	N	Y							
	20 % opacity as a six-minute average	17-07(A)(1)	N							
	77 pounds PM per hour	17-11(A)(4)	N							
	Regenerator flue gas temperature must be greater than 1300 degrees F. Regenerator flue gas oxygen content must be greater than 0.5 %, by volume.	21-09(VV)	N							
	State LDAR requirements	21-09(T)	N							
P003	Use of a flare to control emissions of organic hazardous air pollutants resulting from malfunctions and pressure relief episodes.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC OR - Flare shall be operated while emissions are vented to it and a flame shall be present at all times when the flare is operating. - The permittee is restricted to burning gases with a heating value in excess of 300 BTU/scf in this emission unit. - The permittee is restricted to burning gases at an exit velocity less than 18 meters/sec except when the heating value is greater than 1000 Btu/scf Or the flare is steam assisted.
	No visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	N	Y							Other - 40 CFR, Part 60.18
	State requirements for flares	21-07(J)(3)	N							The requirements specified in this rule are less stringent than the requirements specified in 40 CFR Part 60.18. Appropriate MRR have been specified for the OR listed in this permit.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P004	Use of a flare to control emissions of organic hazardous air pollutants resulting from malfunctions and pressure relief episodes.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC OR - Flare shall be operated while emissions are vented to it and a flame shall be present at all times when the flare is operating. - The permittee is restricted to burning gases with a heating value in excess of 300 BTU/scf in this emission unit. - The permittee is restricted to burning gases at an exit velocity less than 18 meters/sec except when the heating value is greater than 1000 Btu/scf Or the flare is steam assisted.
	No visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	N	Y							Other - 40 CFR, Part 60.18
	State requirements for flares	21-07(J)(3)	N							The requirements specified in this rule are less stringent than the requirements specified in 40 CFR Part 60.18. Appropriate MRR have been specified for the OR listed in this permit.
P007	Applicable Miscellaneous Process Vent Requirements and Applicable LDAR Requirements	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC (specifically, 63.643 and 63.648)
P007 (cont'd)	20 % opacity as a six-minute average	17-07(A)(1)	N							OR - Permittee restricted to burning only refinery fuel gas or natural gas in this emission unit. - Permittee must maintain an average combustion temperature within the thermal oxidizer as specified in the permit. Appropriate MRR have been specified for the OR listed in this permit.
	All VOC emissions shall be vented to a thermal oxidizer that will provide an overall efficiency for VOC equal to or greater than 95 %.	21-09(VV)	N							
	State Equipment Leak Requirements	21-09(T)	N							The equipment leak requirements specified in this rule are less stringent than those specified in 40 CFR Part 63, Subpart CC.
P008	Permittee shall compress and route all off gases to the facility's fuel gas system to be used as fuel.	21-09(M)(1)	N	Y	Y	Y	Y	Y	N	OR - Same as emission unit P003
	During malfunctions, the VDT off gas shall be routed to the south area flare.	21-07(J)(3)	N							

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
	The operation of the flare during malfunction events shall be in accordance with the terms and conditions of emissions unit P003.	N	Y							Other - 40 CFR Part 60.18
P011	250 ppm of SO2 as a rolling, 12-hour average	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR, Part 60, Subpart J OR - The permittee shall operate and maintain a flare system to use during malfunction or upset events of this emissions unit. Appropriate MRR have been specified for the OR listed in this permit.
	8.66 lbs SO2/hr.(when only P011 or P016 is in operation)	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
	21.1 lbs SO2/hr.(when both P011 and P016 are operating)	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
	Applicable state SO2 allowable limitations	18-06(H)	N							The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	37.9 tons SO2/year.	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
P016	250 ppm of SO2 as a rolling, 12-hour average	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR, Part 60, Subpart J OR - The permittee shall operate and maintain a flare system to use during malfunction or upset events of this emissions unit. Appropriate MRR have been specified for the OR listed in this permit.
	8.66 lbs SO2/hr.(when only P011 or P016 is in operation)	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
	21.1 lbs SO2/hr.(when both P011 and P016 are operating)	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
	Applicable state SO2 allowable limitations	18-06(H)	N							The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	37.9 tons SO2/year.	N	Y							Allowable SO2 emissions are found in PTI 15-0649 as BAT.
P018	0.020 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf)	N	Y	Y	Y	Y	Y	Y	N	This allowable is listed in PTI 15-1152 as BAT. OR - All of the particulate emissions from this emissions unit shall be vented to one of three baghouses. The pressure drop across each baghouse shall be maintained within the range of 3 to 6 inches of water while the emissions unit is in operation. Appropriate MRR have been specified for the OR listed in this permit.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
	0.205 lb/hr of particulate emissions	N	Y							This allowable is listed in PTI 15-1152 as BAT.
	0.90 tpy of particulate emissions	N	Y							This allowable is listed in PTI 15-1152 as BAT.
	Visible particulate emissions from this emissions unit shall not exceed 5% opacity as a 3-minute average.	N	Y							This allowable is listed in PTI 15-1152 as BAT.
	Applicable State PM emissions limitations	17-11(B)	N							The emission limitation(s) specified by this rule is (are) less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	Applicable State VE limitations	17-07(A)	N							The emission limitation(s) specified by this rule is (are) less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
Z016	55 lbs/hr of particulate emissions	17-11(B)	N	Y	Y	Y	Y	Y	N	OR - Permittee restricted to a Total Dissolved Solid loading of 4500 mg/l. Appropriate MRR have been specified for the OR listed in this permit.
	20 % opacity as a 6-minute average	17-07(A)	N							
Z017	54 lbs/hr of particulate emissions	17-11(B)	N	Y	Y	Y	Y	Y	N	OR - Permittee restricted to a Total Dissolved Solid loading of 4500 mg/l. Appropriate MRR have been specified for the OR listed in this permit.
	20 % opacity as a 6-minute average	17-07(A)	N							

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
T023, T045, T053 - T057, T059, T061 - T064, T068, T070, T072, T075, T077 - T079, T082 - T091, T093 - T098, and, T130	This emission unit meets the requirements of a Group 2 storage vessel under 40 CFR Part 63, Subpart CC(See Note 2 after this table).	N	Y	N	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC(Refinery MACT) OR - No operational restrictions are required for compliance(See note 2 following this table).
T129	Maintain records in accordance with 40 CFR Parts 60.116(b), sections (a) and (b).	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Parts 60.116(b), sections (a) and (b) OR - Permittee shall utilize a submerged fill line and store liquids with a maximum true vapor pressure of less than 0.5 psia in this storage vessel.
T051, T142 - T144, T148, T149, T162, T167, T169, and T175	The permittee shall employ an internal floating roof with appropriate seals in accordance with 40 CFR Part 60, Subpart Kb.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 60, Subpart Kb OR -The permittee shall operate and maintain the internal floating roof in a manner to control VOC and HAP emissions. This includes utilizing the appropriate seals, maintaining seal integrity and gap requirements, utilizing appropriate vessel filling and emptying techniques, and providing and utilizing appropriate gaskets and covers for vessel openings in accordance with 40 CFR Part Kb as specified in the operational restrictions section of these permits.
	tons per year VOC limitation	N	Y							BAT limitation (OAC rule 3745-31-05(A)(3))
	Applicable State Storage Vessel requirements	21-09(L)	N							The requirements of this rule are less stringent than the requirements specified in 40 CFR Part 60, Subpart Kb.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
T052, T134, T128, T161, T160, T154, T153, T166, T174, T172, T171, T170, and T168	The permittee shall maintain records showing the type of material stored within the storage vessel, the dimensions of the storage vessel, the true vapor pressure of the stored material at maximum storage temperature, and an analysis showing the capacity of the storage vessel.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 60, Subpart Kb (more specifically, 40 CFR Part 60.110b(c)) OR - The permittee shall store only petroleum liquids with a maximum true vapor pressure less than 3.5 Kpa(0.5 psia) in these emission units. The permittee shall also employ a submerged fill line on this storage vessel.
	Tons per year VOC limitation Use of a submerged fill line	N	Y							BAT limitation (OAC rule 3745-31-05(A)(3))
	Applicable State Storage Vessel requirements	21-09(L)	N							The requirements of this rule are less stringent than the requirements specified in 40 CFR Part 60, Subpart Kb.
T024, T034, T033, T030, T028, T037, T044, T043, T041, T040, T050, and T049.	The permittee shall operate this emissions unit as a Group 1 storage vessel by employing an internal floating roof and a metallic shoe primary seal or a vapor type primary seal in conjunction with a wiper type secondary seal to control VOC emissions. The terms and conditions of this permit reflect Group 1 storage vessel operating, monitoring, record keeping, and reporting requirements.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC(Refinery MACT) OR - The permittee shall operate and maintain the internal floating roof in a manner to control VOC and HAP emissions. This includes utilizing the appropriate seals, maintaining seal integrity and gap requirements, utilizing appropriate vessel filling and emptying techniques, and providing and utilizing appropriate gaskets and covers for vessel openings in accordance with 40 CFR Part 63, Subpart CC as specified in the operational restrictions section of these permits.
	Applicable state storage vessel requirements	21-09(L)	N							The requirements of this rule are less stringent than the requirements specified in 40 CFR Part 63, Subpart CC(Refinery MACT)

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
T036, T035, T038, T039, T046, T047, T048, T067, and T065	This emissions unit shall comply with 40 CFR Part 63, Subpart CC by employing an external floating roof and dual seal system as dictated within the terms and conditions for these emission units.	N	Y	Y	Y	Y	Y	Y	N	Other - 40 CFR Part 63, Subpart CC(Refinery MACT) OR - The permittee shall operate and maintain the external floating roof in a manner to control VOC and HAP emissions. This includes utilizing the appropriate seals, maintaining seal integrity and gap requirements, utilizing appropriate vessel filling and emptying techniques, and providing and utilizing appropriate gaskets and covers for vessel openings in accordance with 40 CFR Part 63, Subpart CC as specified in the operational restrictions section of these permits.
	Applicable state storage vessel requirements	21-09(Z)	N							The requirements of this rule are as stringent than the requirements specified in 40 CFR Part 63, Subpart CC(Refinery MACT).

Explanations for unusual requirements or aspects of the terms and conditions:

1. On _____, Marathon Ashland Petroleum Co., LLC(MAP) entered into a Consent Agreement with the State of Ohio (Case Number _____). In accordance with article V (Injunctive Relief) of the Consent Agreement, MAP shall complete installation and begin and maintain operation of the ESP for P002 by no later than December 31, 2005, in accordance with the requirements of the Consent Decree in the Federal Case (United States of America, et al., vs MAP, Civil No. 01-CV-40119), entered August 28, 2001, and as amended thereafter. MAP shall periodically and in good faith review its efforts to install the ESP and shall expedite installation of the ESP, if MAP determines that it is feasible to do so.

On January 22, 1999, Ashland Inc. (currently Marathon Ashland Petroleum Co. LLC, i.e.; MAP) entered into a Consent Agreement (Decree) with the United States of America. The consent decree was the result of a Civil Action (No. 98-157) filed in the United States District Court for the Eastern District of Kentucky. The civil action was filed in response to environmental violations discovered at three of the company’s facilities during a multimedia, multi plant inspection conducted in 1996. The consent decree asserted claims against MAP pursuant to the Clean Air Act, as amended (U.S.C., Section 7401). In accordance with the consent decree, the permittee shall perform the following work pertaining to this emissions unit:
 - a. Undertake a particulate control improvement study identified in Appendix “B” of the consent decree by January 22, 2000 and in the manner specified therein.
 - b. Convert the existing Continuous Opacity Monitor (COM) to a particulate matter/mass continuous emission monitor (CEM) as identified in Appendix “C” of the consent decree. The permittee shall complete construction of this project within six months after a federally approved SIP revision has been issued and is effective and after a modified Title V permit has been received providing for the monitoring of PM emissions utilizing the matter/mass CEM. If conversion of the existing opacity monitor proves to be either technologically or economically not feasible as defined within the consent decree, the permittee shall resume operation of the opacity meter. Disputes regarding the technological or economic feasibility shall be resolved through section XIII of the consent decree.
 - c. The permittee shall comply with all of the other terms and condition of the consent decree specified in section A.VI.1 of these terms and conditions.
2. These emissions units are classified as Group 2 Storage Vessels under 40 CFR, Part 63, Subpart CC(Refinery MACT) and are exempt under OAC rule 3745-21-09(L). In accordance with the Refinery MACT, the permittee shall maintain records to show that the emissions units are being utilized as a Group 2 Storage vessel. To be classified as a Group 2 storage vessel, the design capacity of the storage vessel must be less than 177 cubic meters (46, 763 gallons), store an organic liquid material with a maximum true vapor pressure less than 10.4 kpa (1.51 psia), store an organic liquid material with an average annual true vapor pressure of less than 8.3 kpa (1.21 psia), and store a organic liquid material with an average annual HAP concentration of less than 4 %, by weight, as total organic HAP.

EU = emissions unit id

OR = operational restriction
M = monitoring requirements
R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

7 **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.

7 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 the DAPC decided to resolve them.

7 **Instructions for Part III:**

7 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.

7 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. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

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 each column where "N" is specified, there should be a brief explanation in the "Comments" section. Also, if a "Y" is noted under "OR" or "Misc," an explanation of the requirements should be provided in the "Comments" section. In addition to a general explanation of the "OR" and/or "Misc," the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the "Miscellaneous Requirements" section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

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

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