

Statement of Basis For Title V Permit

Company Name	Perstorp Polyols, Inc.	
Premise Number	0448010133	
What makes this facility a Title V facility?	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.	Two facilities; E.I.DuPont (0448010346) and Perstorp (0448010133) shared a common property line. Perstorp bought the E.I. DuPont facility and became Perstorp Formaldehyde (0448010346) and Perstorp Polyols (0448010313). Perstorp Formaldehyde and Perstorp Polyols became Perstorp Polyols (0448010133) for Title V purposes. The two facilities had similar source numbers, so Perstorp Formaldehyde changed their source numbers by inserting a 1 in the second digit so that P001 became P101 and 8's were added (ie:P801) to include fugitive VOC emissions.	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.		Y	40 CFR Part 63, Subpart G requirements - MACT requirements for process vents, storage vessels, transfer operations and wastewater.
A.2.		Y	40 CFR Part 63, Subpart H requirements - MACT HAP requirements for equipment leaks.
A.3.		Y	40 CFR Part 60, Subpart VV requirements - NSPS VOC requirements for equipment leaks
A.4.	21-09 (DD)		SIP OC requirements for equipment leaks
A.5.		Y	This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and, therefore, is subject to Section 112(r) of the Act.
A.6.		Y	Policy. Emissions unit P101 (formaldehyde manufacturing process) is currently inactive and, therefore, is not included in this Title V operating permit. Requirements have been added which will be met if the emissions unit is activated.
A.7.	77		SIP. Insignificant emissions units are listed.

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

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

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

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001 - 85 mmBtu natural gas/methanol/#2 fuel oil fired boiler with no controls	20 percent opacity, as a 6-minute average.	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - clean fuel. M - daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Tiered approach to weekly modeling allowed.
	0.020 pound/mm Btu PM	17-10 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - installed prior to 1974 (OAC rule 3745-21-08 not applicable), methanol added as authorized in OAC rule 3745-51-38. OR - clean fuel. M - clean fuel requirements. ET - Stack testing performed September 3, 2003 gave 0.002 lb/mmBtu at 54 mmBtu/hr while firing methanol with natural gas. Annual emissions were estimated at 3.19 tpy for 2002. In compliance with engineering guide #16, no additional stack testing will be required at this time.
	None	18-06 (A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt because the natural gas being combusted meets certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet).

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	None	18-06 (D)	N	Y	N	N	N	N	N	N	N	N	N	N	ND -less stringent than the emission limitation established pursuant to 40 CFR 52.1881(b)(29)(ii).
	None	23-06 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - installed prior to 1974 (OAC rule 3745-21-08 not applicable),
	1.00 lb SO2/ mmBtu when fired with #2 fuel oil.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR 52.1881(b)(29)(ii) M - sulfur content testing on the oil as delivered. ET - Compliance is demonstrated through sulfur content testing on the oil as delivered. No stack testing will be required.
B101: natural gas fired boilers with no controls.	20 percent opacity, as a 6-minute average	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - clean fuel. M - daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Tiered approach to weekly modeling allowed.
	0.020 pound/mm Btu PM	17-10 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - clean fuel. M - clean fuel requirements. ET - Annual emissions were estimated at 0.41 tpy for 2002. In compliance with engineering guide #16, no additional stack testing will be required at this time.
	None	18-06 (A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt because the natural gas being combusted meets certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet).
	None	21-08 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - current operating practices will satisfy the "best available control techniques and operating practices" required
	None	23-06 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - current operating practices will satisfy the "latest available control techniques and operating practices" required

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P004 material handling drying and sodium formate bagging controlled by a wet scrubber	0.48 lb/hr & 2.1 tpy PE, and 5% opacity.	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) established by PTI 04-1123. VOC emissions from the drying oven are exempt from 3745-21-07(G) requirements as the feed stock is a moist solid (crystal). The drying oven is steam operated. For BAT purposes, any VOC emissions predicted for the drying operation have been included in the related process, P801, for ease in record keeping. M - continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate to maintain stack test compliance level. ET - stack testing performed May 25, 1999 indicated a PE rate of 0.27 lb/hr, and an opacity of 0% at the maximum throughput rate. Engineering Guide 16 allows stack testing for non-major sources at the discretion of the field office. Based on the guidance of Engineering Guide 16, no retesting is required.
	None	17-07 (A)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - 20% opacity is not as stringent BAT.
	None	17-11 (A)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - 0.48 #/hr is less than the Table 1 minimum process weight rate requirement of 0.551 #/hr & 96% overall control efficiency is greater than the maximum 90% efficiency required by Figure II.
	None	21-07 (G)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Exempt, feed stock is not in a liquid state.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P801: TMP & sodium formate manufact uring process includin g reactors, evaporat ors, coolers, crystalliz ers and distillati on equipme nt controlle d by a catalytic incinerat or. includin g fugitive leaks.	reduce TOC 98% or to 20 ppmv TOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - 40 CFR Part 63, Subpart G. Sources subject to Subpart G include the process vents, storage vessels, transfer racks and wastewater streams which contact hazardous air pollutants (i.e., formaldehyde, acetaldehyde or methanol), as provided in 40 CFR 63.110 and described in Part II of this permit. The permittee must maintain and operate a vapor collection system and control device to collect and control process vent emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.113 as described in Part II of this permit. The permittee must operate and maintain a closed vent system and control device to collect and control storage tank emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 95 weight percent unless otherwise allowed, in accordance with 40 CFR 63.119 as described in Part II of this permit. The permittee must maintain and operate a vapor balance system, or a vapor collection system and control device, to collect and control transfer rack emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.126 as described in Part II of this permit.</p> <p>M - continuously monitor the throughput and incinerator performance to maintain stack test compliance level.</p> <p>OR - minimum temperature restrictions.</p> <p>ET - stack testing performed February 23, 2000 indicated a destruction efficiency of 99.9% at the maximum throughput rate. Stack testing performed May 7, 2002 resulted in HON emissions of 4.2 ppm acetaldehyde, 0.30 ppm formaldehyde and 4.4 ppm methanol = 8.9 ppm TOC against a standard of 20 ppm TOC (vs 98% destruction). Retesting will be required within 6 months of renewal.</p>

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	leak detection and repair program	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart H. Sources subject to Subpart H include the process leaks from pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems required by Subpart H which contact hazardous air pollutants (i.e., formaldehyde, acetaldehyde or methanol), as provided in 40 CFR 63.160 and described in Part II of this permit. Except as otherwise provided, the permittee must establish a hazardous air pollutant (HAP) leak detection and repair program for the affected sources, in compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR 63.162 through 63.170 and 63.172 through 63.174 (as described in Part II of this permit).
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include the maintenance wastewater and heat exchange systems which contact hazardous air pollutants (i.e., formaldehyde, acetaldehyde or methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	0.70 lb/hr & 3.07 tpy VOC, 0.11 lb/hr & 0.48 tpy formaldehyde (process) 2.5 tpy VOC (fugitive)	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) established by PTI 04-949. OR - temperature and throughput restrictions. M - continuously monitor the throughput and incinerator performance to maintain stack test compliance level. ET - stack testing performed June 24, 1997 indicated a formaldehyde emission rate of 0.04 lb/hr, and a OC emission rate of 0.40 lb/hr as carbon, at a throughput rate of 97% of maximum. Based on the guidance of Engineering Guide 16, no retesting is required.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	leak detection and repair program	21-09 (DD)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - the permittee may elect to comply with the VOC leak detection and repair program requirements of OAC rule 3745-21-09(DD) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks.
	leak detection and repair program	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 60, Subpart VV is included as Part II, Section 3 of this permit. The permittee may elect to comply with the VOC leak detection and repair program requirements of 40 CFR Part 60, Subpart VV by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks as provided in 40 CFR 63.160 and described in Part II of this permit.
	None	21-07 (G)(2), (G)(6) (a)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P803: pentaeryt hritol and sodium formate manufact uring process includin g fu material handling controlle d by a wet scrubber and catalytic incinerat or gitive leaks, and	reduce TOC 98% or to 20 ppmv TOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - 40 CFR Part 63, Subpart G. Sources subject to Subpart G include the process vents, storage vessels, transfer racks and wastewater streams which contact hazardous air pollutants (i.e., formaldehyde, acetaldehyde or methanol), as provided in 40 CFR 63.110 and described in Part II of this permit. The permittee must maintain and operate a vapor collection system and control device to collect and control process vent emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.113 as described in Part II of this permit. The permittee must operate and maintain a closed vent system and control device to collect and control storage tank emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 95 weight percent unless otherwise allowed, in accordance with 40 CFR 63.119 as described in Part II of this permit. The permittee must maintain and operate a vapor balance system, or a vapor collection system and control device, to collect and control transfer rack emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.126 as described in Part II of this permit.</p> <p>OR - minimum temperature restrictions.</p> <p>M - continuously monitor the incinerator performance to maintain stack test compliance level.</p> <p>ET - stack testing performed February 23, 2000 indicated a destruction efficiency of 99.9% at the maximum throughput rate. Stack testing performed May 7, 2002 resulted in HON emissions of 4.2 ppm acetaldehyde, 0.30 ppm formaldehyde and 4.4 ppm methanol = 8.9 ppm TOC against a standard of 20 ppm TOC (vs 98% destruction). Retesting will be required within 6 months of renewal.</p>

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	leak detection and repair program	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart H. Sources subject to Subpart H include the process leaks from pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems required by Subpart H which contact hazardous air pollutants, as provided in 40 CFR 63.160 and described in Part II of this permit. Except as otherwise provided, the permittee must establish a hazardous air pollutant (HAP) leak detection and repair program for the affected sources, in compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR 63.162 through 63.170 and 63.172 through 63.174 (as described in Part II of this permit).
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A & F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include the maintenance wastewater and heat exchange systems which contact hazardous air pollutants, as provided in 40 CFR 63.100 and described in Part II of this permit.
	1.25 lb/hr & 5.5 tpy OC, 4.5 lb/hr & 19.71 tpy PE, 14.15 tpy VOC (fugitive).	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established by PTI 04-1232. M - continuously monitor the scrubber liquid flow maintain stack test compliance level. ET - stack testing performed May 7, 2002 resulted in an emissions rate of 0.086 lb PE/hr with 1.2 gpm of water to the scrubber. Based on the guidance of Engineering Guide 16, no retesting for PE is required.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	leak detection and repair program	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 60, Subpart VV is included as Part II, Section 3 of this permit. The permittee may elect to comply with the VOC leak detection and repair program requirements of 40 CFR Part 60, Subpart VV by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks as provided in 40 CFR 63.160 and described in Part II of this permit.
	20 percent opacity	17-07 (A)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - weekly daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit
	None	17-11 (A)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - 4.5 #/hr is less than the Table 1 requirement & 90% overall control efficiency is equivalent to the maximum 90% efficiency required by Figure II.
	None	21-07 (G)(2), (G)(6) (a)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
	None	21-09 (DD)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Comply with the VOC leak detection and repair program requirements of OAC rule 3745-21-09(DD) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P812: Formaldehyde manufacturing with catalytic incinerator and fugitive leaks	reduce TOC 98% or to 20 ppmv TOC	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - 40 CFR Part 63, Subpart G. Sources subject to Subpart G include the process vents, storage vessels, transfer racks and wastewater streams which contact hazardous air pollutants (i.e., formaldehyde or methanol), as provided in 40 CFR 63.110 and described in Part II of this permit. The permittee must maintain and operate a vapor collection system and control device to collect and control process vent emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.113 as described in Part II of this permit.. The permittee must operate and maintain a closed vent system and control device to collect and control storage tank emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 95 weight percent unless otherwise allowed, in accordance with 40 CFR 63.119 as described in Part II of this permit. The permittee must maintain and operate a vapor balance system, or a vapor collection system and control device, to collect and control transfer rack emissions from affected sources. The control device shall reduce the total organic hazardous air pollutants by 98 weight percent or to a concentration of 20 ppm by volume, whichever is less stringent, in accordance with 40 CFR 63.126 as described in Part II of this permit.</p> <p>M - continuously monitor the incinerator performance to maintain stack test compliance level.</p> <p>ET - stack testing performed February 22, 2000 indicated a destruction efficiency of 99.9% at a throughput rate of 86% of maximum. Retesting will be required within 180 days of permit issuance and within 6 months of permit renewal.</p>

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	leak detection and repair program	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 60, Subpart VV & 40 CFR Part 63, Subpart H. Sources subject to Subpart H include the process leaks from pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems required by Subpart H which contact hazardous air pollutants (i.e., formaldehyde, or methanol), as provided in 40 CFR 63.160 and described in Part II of this permit. Except as otherwise provided, the permittee shall establish a hazardous air pollutant (HAP) leak detection and repair program for the affected sources, in compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR 63.162 through 63.170 and 63.172 through 63.174 as described in Part II of this permit).
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include the maintenance wastewater and heat exchange systems which contact hazardous air pollutants (i.e., formaldehyde, acetaldehyde or methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	2.5 lb/hr & 11.0 tpy CO, 0.64 lb/hr & 2.8 tpy formaldehyde, 2.5 lb/hr & 11.0 tpy methanol, 7.5 lb/hr & 32.9 tpy dimethyl ether, 13.14 lb/hr & 57.7 tpy VOC (process), 7.02 tpy VOC (fugitive).	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established by PTI 04-1109. OR - added after heat exchanger leakage contaminated the Ottawa River. M - continuously monitor the incinerator performance to maintain stack test compliance level. ET - stack testing performed February 22, 2000 indicated: a CO emission rate of 0.44 lb/hr, a dimethyl ether emission rate of 0.28 lb/hr, a methanol emission rate of 0.2 lb/hr, a formaldehyde emission rate of 0.03 lb/hr, and a VOC emission rate of 0.23 lb/hr as CH4, at a throughput rate of 86% of maximum. Retesting will be required within 6 months of renewal.
	None	21-09 (B)(4)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - comply with the catalytic incinerator monitoring, record keeping and reporting requirements of OAC rule 3745-21-09(B)(4) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart G for all air oxidation process vents.
	None	21-09 (DD)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - comply with the VOC leak detection and repair program requirements of OAC rule 3745-21-09(DD) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks.
	None	21-09 (EE)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - comply with the VOC restrictions of OAC rule 3745-21-09(EE) by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart G for all air oxidation process vents.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - comply with the VOC leak detection and repair program requirements of 40 CFR Part 60, Subpart VV by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - comply with the VOC restrictions of 40 CFR Part 60, Subpart III by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart G for all air oxidation process vents.
T001: <75 m ³ , >40 m ³ fixed roof tank with no control.	0.15 tpy VOC, submerged fill, record keeping requiremen ts	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - Established by the BAT determination of PTI 04-479. Submerged fill is equivalent to OAC rule 3745-21-07(D)(2). M - record on a monthly basis types of liquids and throughputs to allow emissions calculation, submerged fill confirmed by one time compliance inspection on start-up. R - equivalent to 40 CFR Part 60, Subpart Kb requirements.
	None	21-07 (D)(2)	N	N	Y	N	N	N	N	N	N	N	N	N	ND - not applicable. Formic acid is not a volatile photochemically reactive material.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - 40 CFR Part 60, Subpart Kb requirements no longer apply to this size tank.
T004: <75m ³ >40 m ³ fixed roof tank with catalytic incinerat or	3.07 tpy VOC from P801, T004 and T006	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-479 and modified by PTI 04-949. Joint limitation, requires use of a collection system and catalytic incinerator. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level. OR - temperature requirements for the catalytic incinerator.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	0% opacity	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-479. Joint limitation, requires use of a collection system and catalytic incinerator which has enforceable M R & RP under the terms of P803. M - weekly daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit under P803. OR - temperature requirements for the catalytic incinerator.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for Formaldehyde. Group 2 <75 m ³ . OR - temperature requirements for the catalytic incinerator.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	21-07 (D)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Does not apply as formaldehyde is not a volatile photochemically reactive material.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the tank is <40 m ³ .
T006: >75 m ³ <151 m ³ 3.5<vp< 76.6kPa fixed roof tank with catalytic incinerat	3.07 tpy VOC from P801, T004 and T006	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-479 and modified by PTI 04-949. Joint limitation, requires use of a collection system and catalytic incinerator. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level. OR - temperature requirements for the catalytic incinerator.

or

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	0% opacity	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-479. Joint limitation, requires use of a collection system and catalytic incinerator which has enforceable M R & RP under the terms of P803. M - weekly daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit under P803. OR - temperature requirements for the catalytic incinerator.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for Formaldehyde. Group 2 < 5.2 kPa. OR - temperature requirements for the catalytic incinerator.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63 Subparts A&F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	21-07 (D)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Does not apply as formaldehyde is not a volatile photochemically reactive material.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb compliance demonstrated through compliance with 40 CFR Part 63 Subpart F & G.
T016 <40 m ³ fixed roof tank with catalytic incinerator	0.03 tpy of organic compounds	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-652. Requires the use of a collection system and catalytic incinerator which has enforceable M R & RP. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level. OR - temperature requirements for the catalytic incinerator.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for Formaldehyde. Group 2 <75 m ³

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the tank is <40 m ³ .
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - not applicable. Formaldehyde is not a volatile photochemically reactive material. Tank is equipped with submerged fill confirmed by one time compliance inspection on start-up.
T017 <40 m ³ fixed roof tank with catalytic incinerator	0.03 tpy of organic compounds	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-652. Requires the use of a collection system and catalytic incinerator which has enforceable M R & RP. OR - temperature requirements for the catalytic incinerator. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level.
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for methanol. Group 2 <75 m ³
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - not applicable. Methanol is not a volatile photochemically reactive material. Tank is equipped with submerged fill confirmed by one time compliance inspection on start-up.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the tank is <40 m ³ .

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
T020 & T021 >75 m ³ <151 m ³ < 15 kPa Fixed roof storage tank for trimethylolpropane, with liquid seal filled with glycerine	0.24 tpy VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-949. OR - The permittee shall maintain and operate a pressure relief valve with a minimum setting of 2" water column and a liquid seal filled with glycerine. Glycerine seal satisfies OAC rule 3745-21-07(D)(1)(c). M - record types of liquids and throughputs to allow uncontrolled emissions calculation. One time compliance inspection on start-up for pressure relief valve and liquid seal .	
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for Formaldehyde. Group 2 <75 m ³ . Except as provided in 40 CFR Part 63.119(a), the permittee shall comply with the requirements for a Group 2 storage vessel. Except as otherwise provided in 40 CFR 63.123 this requires the permittee to keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records must be maintained for the life of the emissions unit.	
	applicable requirements	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63 Subparts A&F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants, as provided in 40 CFR 63.100 and described in Part II of this permit.	
	None	21-07 (D)(2)	N		Y	N	N	N	N	N	N	N	N	N	N	ND - not a volatile photochemically reactive material, actual vapor pressure is less than 1.5 psia.
	None	N		Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the VP is <15 kPa.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
T023 fixed roof tank with no controls, >75 m ³ <151 m ³ < 15 kPa	0.59 tpy VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-01251. M - record types of liquids and throughputs to allow uncontrolled emissions calculation.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - not a volatile photochemically reactive material, actual vapor is less than 1.5 psia.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the VP is <15 kPa.
T024 fixed roof tank with no controls, >75 m ³ <151 m ³ < 15 kPa	0.68 tpy of VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 3745-31-05(A)(3) as established in PTI 04-01251. M - record types of liquids and throughputs to allow uncontrolled emissions calculation.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - not a volatile photochemically reactive material, actual vapor pressure is less than 1.5 psia.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb is not applicable as the VP is <15 kPa.
T025 fixed roof tank with no controls, <75 m ³ <13.1 kPa	applicable requiremen ts	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for Formaldehyde as a Group 2 due to volume and vapor pressure.
	applicable requiremen ts	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A & F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - OAC rule 3745-31-05(A)(3), when installed was considered a "process" or "day tank" not requiring a PTI versus a raw material tank that required a PTI: since MACT is applicable, no BAT determination is required.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Formaldehyde is not a volatile photochemically reactive material.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt from 40 CFR Part 60, Subpart Kb, installed before July 23, 1984 (installation date of 6/79) and Subpart Ka by <40,000 gallons.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
T026, T027, T028 & T029 fixed roof tank with a catalytic incinerator, <75 m ³ >13.1 kp	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for formaldehyde and methanol. OR - subject to Group 1 requirements based on volume and vapor pressure (4.3 psia = 30 kPa): operate and maintain a closed vent system and control device to collect and control the storage tank emissions. The control device shall reduce the total organic hazardous air pollutants by 95 weight percent except as provided in 40 CFR 63.119 as described in Part II of this permit.
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A & F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde & methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND - exempt from OAC rule 3745-31-05(A)(3), installed before January 1 1974.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt from 40 CFR Part 60, Subpart Kb, installed before July 23, 1984 (installation date of 6/72) and Subpart Ka by <40,000 gallons.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Formaldehyde and methanol are not volatile photochemically reactive materials.
T101 & T102: fixed roof tank with a catalytic incinerator, >151 m ³ >13.1 kp	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for formaldehyde. OR - subject to Group 1 requirements based on volume and vapor pressure (4.3 psia maximum = 30 kPa): operate and maintain a closed vent system and control device to collect and control the storage tank emissions. The control device shall reduce the total organic hazardous air pollutants by 95 weight percent except as provided in 40 CFR 63.119 as described in Part II of this permit.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A & F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - exempt from 40 CFR Part 60, Subpart Kb, installed before July 23, 1984 (installation date of 6/72) and Subpart Ka installed before May 18, 1978 and Subpart K installed before June 11, 1973.
	None	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND - exempt from OAC rule 3745-31-05(A)(3), installed before January 1 1974.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - formaldehyde is not a volatile photochemically reactive material.
T104 IFR tank with no controls	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H for formaldehyde and methanol. OR - Sources subject to Subpart G include storage vessels which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.110 and described in Part II of this permit. Except as provided in 40 CFR 63.119 as described in Part II of this permit, the permittee shall equip and maintain a fixed roof and internal floating roof for this emissions unit.
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A & F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	Basis - exempt from 40 CFR Part 60, Subpart Kb, installed before July 23, 1984 (installation date of 6/72) and Subpart Ka installed before May 18, 1978 and Subpart K installed before June 11, 1973.
	None	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND - exempt from OAC rule 3745-31-05(A)(3), installed before January 1 1974.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - methanol is not a volatile photochemically reactive material.
T105: <40,000 gallons >75 m ³ fixed roof tank with a condenser and a thermal incinerator.	0.08 tpy formaldehyde/methanol	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established in PTI 04-278. OR - requires minimum temperature in the thermal incinerator. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level.
	closed vent system and 97% effective control	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3). OR - requires minimum temperatures in the thermal incinerator. M - continuously monitor the incinerator performance to maintain stack test compliance level.
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart F & G for Group 1 >75 m ³ > 13.1 kp formaldehyde and methanol. 95% minimum control efficiency.
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde & methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Formaldehyde and methanol are not volatile photochemically reactive materials.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb compliance demonstrated through compliance with 40 CFR Part 63 Subpart F & G.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745-)	Other													
T106: <40,000 gallons >75 m ³ fixed roof tank with thermal incinerator.	0.14 tpy formaldehyde/methanol	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established in PTI 04-278. OR - requires minimum temperature in the thermal incinerator. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level.	
	closed vent system and 97% effective control	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3). OR - requires minimum temperatures in the thermal incinerator. M - continuously monitor the incinerator performance to maintain stack test compliance level.	
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart F & G for Group 1 >75 m ³ > 13.1 kp formaldehyde and methanol. 95% minimum control efficiency.	
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde & methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.	
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND - Formaldehyde and methanol are not volatile photochemically reactive materials.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb compliance demonstrated through compliance with 40 CFR Part 63 Subpart F & G.
T108 IFR tank with no controls	0.2 tpy methanol	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established in PTI 04-278. M - record types of liquids and throughputs to allow uncontrolled emissions calculation.	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H Group 1 (>151 m ³ > 5.2 kp) for methanol. OR - Sources subject to Subpart G include storage vessels which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.110 and described in Part II of this permit. Except as provided in 40 CFR 63.119 as described in Part II of this permit, the permittee shall equip and maintain a fixed roof and internal floating roof for this emissions unit.
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb compliance demonstrated through compliance with 40 CFR Part 63 Subpart F & G.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - methanol is not volatile photochemically reactive material.
T109, T110 & T111: >75 m ³ fixed roof tank with catalytic incinerator.	0.01 tpy VOC	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established by PTI 04-1043. M - record types of liquids and throughputs to allow uncontrolled emissions calculation and continuously monitor the incinerator performance to maintain stack test compliance level.
	closed vent system and 98% effective control	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - OAC rule 3745-31-05(A)(3) as established by PTI 04-1043. OR - requires minimum temperatures in the catalytic incinerator. M - continuously monitor the incinerator performance to maintain stack test compliance level.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Basis - 40 CFR Part 63, Subpart G & H Group 1 (>151 m ³ > 5.2 kp) for formaldehyde 95% minimum control efficiency. Basis - 40 CFR Part 63, Subpart F & G for Formaldehyde. Group 1 > 151m ³ > 5.2 kp. OR - closed vent system and 95% effective control
	applicable requirements	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	ND - 40 CFR Part 63 Subparts A& F. Sources subject to Subparts G or H are also subject to Subparts A & F. Sources subject to Subpart F include systems which contact hazardous air pollutants (i.e., formaldehyde & methanol), as provided in 40 CFR 63.100 and described in Part II of this permit.
	None	21-07 (D)(2)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - Formaldehyde is not volatile photochemically reactive material..
	None	N	Y	Y	N	N	N	N	N	N	N	N	N	N	ND - NSPS 40 CFR Part 60 Subpart Kb compliance demonstrated through compliance with 40 CFR Part 63 Subpart F & G.

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.