

# Statement of Basis For Title V Permit

Company Name	Premcor Refining Group, Inc.	
Premise Number	0302020012	
What makes this facility a Title V facility?	VOC, CO, NOx, PE, SO2, HAPs emissions	
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.1	25	N	Emergency Episode Standards
A.2	21-09 (T)	N	Leaks from petroleum refinery equipment
A.3	21-10 (F)	N	Leak detection requirements for VOC from petroleum refinery equipment
A.4	21-09 (M)(3)	N	Process unit turnarounds
A.5	N	Y	Other - 40 CFR 61, Subpart V - NESHAPS for equipment leaks (fugitive emission sources)
A.6	21-09 (DD)	N	Requirements for leaks from process units that produce organic chemicals
A.7 through A.20, A.37	N	Y	Other - MACT standards in 40 CFR 63, Subpart CC for petroleum refineries
A.21 through A.36	N	Y	Other - 40 CFR 60, Subpart VV - NSPS for leak detection and repair
A.38 through A.52	N	Y	Other - 40 CFR 61, Subpart FF - NESHAPS for benzene waste operations

B.1	Y		Lists each insignificant emissions unit located at the facility and states that each unit must still comply with all applicable state and federal regulations as well as any issued PTI.
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▼ **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		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
B001, B002, B003, B004, B005, B006, B007, B008, B009, B016, B018	0.020 lb of PE/million Btu of actual heat input	17-10 (B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - the permittee shall fire only refinery fuel gas in these emissions units, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B022, B023, B024	0.014 lb of PE/million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in these emissions units, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

B026	1.03 lb of PE/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
P031, P032	0.310 lb of PE/million Btu of actual heat input	17-11 (B)(5) (a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - The permittee shall burn only gasoline in this emissions unit, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B001, B002, B003, B004, B005, B006, B007, B008, B009, B016, B018, B022, B023, B024, B026, B027, P031, P032	20% opacity as a six-minute average	17-07 (A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P010	20% opacity as a six-minute average	17-07 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - permittee operates an opacity monitor, R and Rp requirements have been established in permit, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

P006, P007, P036	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	N	N	<p>Other - limit established by 40 CFR 63.11(b)(4)</p> <p>OR - MACT requirements are listed in the operational restriction for heat content and exit velocity for the flares, CAM not currently applicable</p> <p>ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.</p>
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EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
B002, B005	1.0 lb of SO2/ million Btu of actual heat input	18-08 (C)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - the permittee shall fire only refinery fuel gas in these emissions units, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B022, B023, B024	0.024 lb of SO2/ million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in these emissions units, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B026	8.57 lbs of SO2/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit, CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B027	4.30 lbs of SO2/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit , CAM not currently applicable ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

P002, P011, P015	100 lbs of SO2/1,000 lbs of sulfur processed at the Claus Unit (for 3 emissions units combined)	18-08 (C)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - stack test required for SO2 - Engineering Guide #16 for test frequency
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EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
P004	11.0 lbs of SO2/ton of product	18-08 (C)(4)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P005	1,143 lbs of SO2/hr	18-06 (E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - stack test required for SO2 - Engineering Guide #16 for test frequency
P010	0.92 lb of SO2/1,000 lbs of fresh feed	18-08 (C)(5)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - the permittee shall fire only refinery fuel gas in the CO boiler, CAM not currently applicable ET - stack test required for SO2 - Engineering Guide #16 for test frequency
P014	1,620 lbs of SO2/hr	18-06 (E)(2)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - stack test required for SO2 - Engineering Guide #16 for test frequency
B022, B023, B024, B026, B027	hydrogen sulfide limitation for refinery fuel gas of 230 mg/dscm (0.10 grain/dscf)	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - refinery fuel gas limitation established by 40 CFR 60.104(a)(1) OR - The permittee shall burn only refinery fuel gas in these emissions units, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B022, B023, B024	0.150 lb of NOx/ million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only refinery fuel gas in these emissions units, CAM not currently applicable. ET - stack test required for NOx - Engineering Guide #16 for test frequency
B026	0.13 lb of NOx/ million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - The permittee operates a NOx CEM and submits quarterly monitoring reports, thus, the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
B027	0.13 lb of Nox/ million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - stack test required for NOx - Engineering Guide #16 for test frequency
B027	22.88 lbs of NOx /hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - The permittee shall burn only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - stack test required for NOx - Engineering Guide #16 for test frequency
P025	1.92 lbs of NOx/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) M, R, Rp, ET - the thermal oxidizer is fired with refinery fuel gas. The hourly NOx emission limitation is based on the maximum fuel firing rate. Thus, M, R, and Rp requirements are not necessary. Also, the emissions unit is non-major per Engineering Guide #16 (actual emissions less than 25 tpy for NOx). Thus, emission testing is discretionary and is being waived for NOx.
B022, B023, B024	0.016 lb of CO/million Btu of actual heat input	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in these emissions units, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B026	13.72 lbs of CO/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
B026	0.74 lb of VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
B027	0.25 lb of VOC/hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) OR - the permittee shall fire only refinery fuel gas in this emissions unit, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P019	1.53 lbs of OC/hr and 6.70 tons of OC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05. OR - operation of benzene vent scrubber required, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P023	0.51 lb of OC/hr and 2.23 tons of OC/yr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05. OR - operation of benzene vent scrubber required, CAM not currently applicable. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P025	1.0 lb of VOC/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) ET - stack test required annually for OC, consistent with permit to install for this emissions unit.

P027	less than 0.1 lb of VOC/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05. ET - This emissions unit must comply with all terms and conditions for emissions unit P006, since emissions are routed to the FCC/coker flare. The R and Rp requirements for the flare are sufficient to demonstrate compliance without requiring formal testing.
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
P029	0.59 lb of fugitive VOC/hr and 2.58 tons of fugitive VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the hourly and annual emission limitations are based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T018	6.71 tons of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T019	6.58 tons of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T057	8.05 tons of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T059	7.91 tons of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.

T121	9.33 tons of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T190	0.67 lb of VOC/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745-)	Other												
T198	0.57 ton of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
T201	0.97 ton of VOC/yr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.
P025	less than 0.1 lb of benzene/hr	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - emission limit established by OAC rule 3745-31-05(A)(3) ET - stack testing not required since the maximum benzene fraction is 0.1% by weight in oils processed by the oil/water separator, and facility already tracks benzene content of waste stream for 40 CFR 61 Subpart FF purposes, and this is a controlled waste stream per benzene waste operations Subpart FF regulations.
T190	0.04 lb of benzene/hr	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - emission limit established by OAC rule 3745-31-05. M, R, Rp, ET - the emission limitation is based on the potential to emit. Therefore, no monitoring, record keeping, reporting or emission testing are necessary to demonstrate compliance.

P002, P006, P007, P014, P015, P019, P036	Control, design and work practice require- ments	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - MACT standards in 40 CFR 63, Subpart CC are applicable. OR - record keeping and reporting required per MACT standards. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
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T081, T084, T085, T086, T087, T088, T090, T091, T092, T093, T097, T100, T112, T121, T123, T161, T164, T175, T176, T177, T178, T179, T180, T181, T182, T184, T190, T191, T192, T194, T195, T196, T197, T198, T201, T202, T203, T204, T205, T206, T207, T208, T212, T217, T218	Control, design and work practice require- ments	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - MACT standards in 40 CFR 63, Subpart CC are applicable. OR - record keeping and reporting required per MACT standards. ET - the R and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
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EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
F001	not applicable	17-07 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - pursuant to OAC rule 3745-17-07(B)(11)(e) plant roadways and parking areas are exempt from 17-07(B)
F001	not applicable	17-08 (B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - refinery is not located in Appendix A area, thus 17-08 is not applicable
J001	not applicable	21-07 (E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - loading rack not located in a Priority 1 county per 21-06(A).
J002	not applicable	21-07 (E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - loading rack not located in a Priority 1 county per 21-06(A).
P004	not applicable	17-11 (B)(1)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - uncontrolled mass rate of emission less than 10 lbs/hr, Fig. II is not applicable, Table 1 not applicable, since only refinery fuel gas is burned, and process weight rate equals zero.
P004, P005	not applicable	17-07 (A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - visible emission limit is not applicable, since 17-11 is not applicable
P005	not applicable	21-07 (G)	N	Y	N	N	N	N	N	N	N	N	N	N	ND - emissions unit not located in a Priority 1 county per 21-06(A).
P033	5.24 lbs of PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	Y	MISC - facility required to apply for a PTI within 2 months of permit issuance.  ET - the M, R, and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P034	5.49 lbs of PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	Y	MISC - facility required to apply for a PTI within 2 months of permit issuance.  ET - the M, R, and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P037	43.95 lbs of PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - the M, R, and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.
P038	23.4 lbs of PE/hr	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - the M, R, and Rp requirements are sufficient to demonstrate compliance without requiring formal testing.

P033, P034, P037, P038	20% opacity as a six- minute average	17-07 (A)	N	N	N	N	N	N	N	N	N	N	N	Y	N	ET - Method 9 is required on an "if required" basis. Visible particulate emissions are not expected for these emissions units.
T018, T019, T047	not applicable	21-09 (Z)(3) (c)	N	Y	N	N	N	N	N	N	N	N	N	N	N	ND - vapor pressure of product stored is less than 1.5 psia, so rule is not applicable

EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
T165, T200, T202, T203, T204, T209, T210, T211, T215, T216, T219	not applicable	21-09 (L)(2); (L)(3); and (L)(4)	N	Y	Y	N	N	N	N	N	N	N	N	N	ND - each tank has fixed roof, with storage capacity less than 40,000 gallons; so rules are not applicable OR - vapor pressure of stored product limited to less than 1.52 psia
T018, T019, T047, T076, T083, T165, T200, T209, T210, T211, T213, T214, T215, T216, T219	not applicable	40 CFR 63, Subpart CC	N	Y	Y	N	N	N	N	N	N	N	N	N	ND - each tank is a group 2 storage vessel as defined in 40 CFR 63.641 at an existing source, with maximum vapor pressure less than 1.51 psia; thus is exempt from MACT requirements. OR - vapor pressure of stored product limited to less than 1.51 psia

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.