Statement of Basis For Title V Permit

Company Name	The Timken Company - Faircrest Steel Plant
Premise Number	15-76-00-0613 (TVP008)
What makes this facility a Title V facility?	The facility has the potential to emit over 100 tons per year of carbon monoxide, nitrogen oxides, particulate emissions, sulfur dioxide and volatile organic compounds.
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.	Yes, there are several emissions units that generate particulate emissions.. A common baghouse controls emissions from individual emissions units housed in an evacuated melt shop. The discharge of the baghouse is limited by a mass per volume concentration and a pound per hour limit based on a maximum air volume.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	77-01 (Q)		Clarification - three separately permitted facilities are now combined pursuant to OAC rule 3745-77-01(Q)

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

EU(s)	Limitation	Basis		ND	OR	M	ST	ENF	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other										
B101	.020 lb PM / MMBtu	17-10		N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B101	0.55 lb SO2 / MMBtu	18-06		N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B101	0.04 lb CO / MMBtu		PTI 15-0144	N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B101	0.25 lb NOx / MMBtu		PTI 15-0144	N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B101	20% opacity, six minute average	17-07(A)(1)		N	Y	Y	N	N	Y	Y	Y	N	ET- If required, compliance will be demonstrated by employing USEPA Method 9.
B102	.020 lb PM / MMBtu	17-10		N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B102	0.55 lb SO2 / MMBtu	18-06		N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B102	0.04 lb CO / MMBtu		PTI 15-0144	N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B102	0.25 lb NOx / MMBtu		PTI 15-0144	N	Y	Y	N	N	Y	Y	N	N	ET- Compliance shall be demonstrated through use of AP-42 emission factors.
B102	20% opacity, six minute average	17-07(A)(1)		N	Y	Y	N	N	Y	Y	Y	N	ET- If required, compliance will be demonstrated by employing UEPA Method 9.
F102	No V.E.'s from paved roads	17-07(B)(4)		N	N	Y	N	N	Y	Y	Y	N	ET - Compliance shall be demonstrated by using USEPA Method 22.
F102	RACM	17-07(B)(8)		N	N	Y	N	N	Y	Y	Y	N	ET - Compliance shall be demonstrated by using USEPA Method 22.
F102	No V.E.'s from unpaved roads	17-07(B)(5)		N	N	Y	N	N	Y	Y	Y	N	ET - Compliance shall be demonstrated by using USEPA Method 22.

F102	RACM	17-07(B)(8)		N	N	Y	N	N	Y	Y	Y	N	ET - Compliance shall be demonstrated by using USEPA Method 22.
K101	0.55 lb/hr particulate matter	17-11		N	N	Y	N	N	Y	Y	Y	N	ET - Compliance shall be demonstrated by calculations.
K101	No visible paint emissions		PTI-15-0144	N	N	Y	N	N	Y	Y	Y	N	ET-If required, compliance will be demonstrated by employing USEPA Method 9.
K101	20% opacity, six minute average	17-07		N	N	Y	N	N	Y	Y	Y	N	ET-If required, compliance will be demonstrated by employing USEPA Method 9.
K101	Not more than 10 gal. coating/day	21-09(U)		N	N	Y	N	N	Y	Y	N	N	Compliance demonstrated through record keeping/reporting.
P102	0.14 lb VOC/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Method 25.
P 102	0.35 lb NOx/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Method 7.
P102	0.00077 lb Lead/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Method 29.
P102	0.0052 gr PM/dscf		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be demonstrated by employing USEPA Test Methods 1-5.
P102	99.65 % baghouse removal efficiency		PTI-0144	N	N	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA ET- Compliance shall be demonstrated through calculations USEPA test Methods 1-5.
P102	4.8 lb CO/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Method 10.

P102	2.25 lb Fluorides/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Method 13A.
P102	0.25 lbs SO2/ton		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated by employing USEPA Test Methods 1-4 , 6.
P102	Opacity limits: 3% baghouse stack, 6% shop, 20% shop during charging, 40 % shop during tapping		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be confirmed by employing USEPA Test Mehod 9.
P102	20% opacity, 6-minute ave., stack	17-07(A)(1)		Y	Y	N	N	N	N	N	N	N	PTI 15-0144 opacity limits more restrictive.
P102	20% opacity 3-minute ave.	17-07(B)(3)		Y	Y	N	N	N	N	N	N	N	PTI 15-0144 opacity limits more restrictive
P102	RACM	17-07(B)(3)		N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be confirmed by employing USEPA Test Mehod 9.
P102	521.64 lbs SO2/hr	18-06(E)(1)		Y	Y	N	N	N	N	N	Y	N	The BACT limits are more restrictive.
P104	Particulate Emissions 0.02 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be demonstrated by use of emission factors.
P104	Sulfur Dioxide 0.55 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	N	N	SO2 assumed to be negligible when firing inherently clean fuels.
P104	Nitrogen Oxides 0.50 lb/MMBtu		PTI-0144	N	N	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be demonstrated through the use of USEPA Methods 1-4, and 7.
P104	Carbon Monoxide .04 lb/MMBtu		PTI-0144	N	N	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated through the use of USEPA Methods 1-4, and 7.
P104	Does not apply	17-07(A)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined
P104	Does not apply	17-11		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined

P104	Does not apply	18-06(E)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined
P105	Particulate Emissions 0.02 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. Compliance shall be demonstrated by use of emission factors.
P105	Sulfur Dioxide 0.55 lb/MMBtu		PTI-0144	N	N	N	N	N	N	N	Y	N	SO2 assumed to be negligible when firing inherently clean fuels.
P105	Nitrogen Oxides 0.50 lb/MMBtu		PTI-0144	N	N	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be demonstrated through the use of USEPA Methods 1-4, and 7.
P105	Carbon Monoxide .04 lb/MMBtu		PTI-0144	N	N	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be demonstrated through the use of USEPA Methods 1-4, and 7.
P105	Does not apply	17-07(A)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined
P105	Does not apply	17-11		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined
P105	Does not apply	18-06(E)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined
P106	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	N	N	N	Y	Y	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be determined by employing USEPA Methods 1-5.
P106	20% opacity as a six-minute ave.	17-07(A)(1)		N	Y	N	N	N	N	N	Y	N	ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.
P106	Less stringent than BACT	17-11		N	N	N	N	N	N	N	N	N	Particulate emissions testing conducted for BACT limit.
P107	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	N	N	N	Y	Y	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET- Compliance shall be determined by employing USEPA Methods 1-5.
P107	Less stringent than BACT	17-11		N	N	N	N	N	N	N	N	N	Particulate emissions testing conducted for BACT limit.
P107	20% opacity as a six-minute ave.	17-07(A)(1)		N	Y	Y	N	N	Y	Y	Y	N	ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.

P109	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be determined by employing USEPA Methods 1-5.
P109	Less stringent than BACT	17-11		N	N	N	N	N	N	N	N	N	Particulate emissions testing conducted for BACT limit.
P109	20% opacity as a six-minute ave.	17-07(A)(1)		N	Y	N	N	N	N	N	Y	N	ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.
P111	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be determined by employing USEPA Methods 1-5.
P111	Less stringent than BACT	17-11		N	N	N	N	N	N	N	N	N	Particulate emissions testing conducted for BACT limit.
P111	20% opacity as a six-minute ave.	17-07(A)(1)		N	N	N	N	N	N	N	Y	N	ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.
P112	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	ET- Compliance shall be determined by employing USEPA Methods 1-5.
P112	Less stringent than BACT	17-11		N	N	N	N	N	N	N	N	N	ET-Particulate emissions testing conducted for BACT limit.
P112	20% opacity as a six-minute ave.	17-07(A)(1)		N	N	N	N	N	N	N	Y	N	ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.
P113	Particulate emissions 0.02 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors.
P113	Nitrogen Oxides 0.50 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be confirmed by employing USEPA Test Mehod 10.
P113	Carbon Monoxide 0.04 lb/MMBtu		PTI-0144	N	Y	N	N	N	N	N	Y	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance demonstrated by use of AP-42 emissions factors
P113	20% opacity as a six-minute ave.	17-07(A)(1)		N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be confirmed by employing USEPA Test Mehod 9.
P113	Does not apply	17-11		Y	N	N		N	N	N	N	N	No process weight rate.

P116	Particulate emissions 0.01 gr/dscf		PTI-0144	N	Y	Y	N	N	Y	Y	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing USEPA Methods 1-5.
P116	20% opacity as a six-minute ave.	17-07(A)(1)		N	Y	Y	N	N	Y	Y	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be confirmed by employing USEPA Test Method 9.
P116	Less stringent than BACT	17-11		Y	N	N	N	N	N	N	N	N	ET-Compliance testing conducted for BACT.
P116	RACM	17-08(B)(3)		N	N	Y	N	N	Y	Y	Y	N	ET-If required Methods 1-5 or Method 22 shall be used to prove compliance with mass emission limitation or no visible emissions from baghouse P116BH-1.
P116	Less stringent than BACT	17-07(B)(1)		Y	N	N	N	N	N	N	N	N	ET-Compliance testing conducted for RACM.
P123	Particulate emissions 0.091 lb/hr		PTI15 1157	N	Y	N	N	N	N	N	N	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by application of emission factors.
P123	Organic compounds 0.085 lb/hr		PTI15 1157	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing USEPA Methods 1-4, 25
P123	Nitrogen oxides 2.058 lb/hr		PTI15 1157	N	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing USEPA Methods 1-4, 25.
P123	Carbon monoxide 0.515 lb/hr		PTI15 1157	N	Y	N	N	N	N	N	N	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing an AP-42 emission factor for CO.
P123	No applicable limit	17-07(A)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined.
P123	This rule does not apply	17-11		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined.

P123	No applicable sulfur dioxide limit	18-06(E)(1)		Y	N	N	N	N	N	N	N	N	No process weight rate can be determined.
P124	Particulate emissions 0.091 lb/hr		PTI15 1162	N	Y	N	N	N	N	N	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors.
P124	Organic compounds 0.085 lb/hr		PTI15 1162	Y	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing USEPA Methods 1-4, 25
P124	Nitrogen oxides 2.058 lb/hr		PTI15 1162	Y	Y	N	N	N	N	N	Y	N	M - Emission test required to show compliance. R- Emission test required to show compliance. RP-Emission test required to show compliance. ET-Compliance shall be determined by employing USEPA Methods 1-4, 25.
P124	Carbon monoxide 0.515 lb/hr		PTI15 1162	Y	Y	N	N	N	N	N	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by employing an AP-42 emission factor for CO.
P124	No applicable limit	17-07(A)(1)		N	N	N	N	N	N	N	N	N	No process weight rate can be determined.
P124	This rule does not apply	17-11		N	N	N	N	N	N	N	N	N	No process weight rate can be determined.
P124	No applicable sulfur dioxide limit	18-06(E)(1)		N	N	N	N	N	N	N	N	N	No process weight rate can be determined.
P127	PE/PM100.008 lb/mmBtu 0.16 lb/hr; 0.7 tpy		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors
P127	Sulfur Dioxide 0.0006 lb/mmBtu 0.012 lb/hr; 0.7 tpy		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors
P127	Nitrogen Oxide 0.14 lb/mmBty and 12.3 tpy		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors

P127	Carbon monoxide0.85 lb/mmBtu and 1.7 lb/hr; 7.45 tpy		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors
P127	Volatile Organic Compounds 0.0055 lb/mmBtu; 0.11 lb/hr; 0.48 tpy		PTI15 1339	N	Y	N	N	N	N	N	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by application of emission factors
P127	P.E Opacity < 5% as 6-min. ave.		PTI15 1339	N	N	Y	N	Y	Y	Y	N	N	ET-presumptive compliance based on inherently clean fuel
P127	Fugitive particulate emissions	17-07(A)(1)		N	N	N	N	N	N	N	N	N	This emissions unit is exempt from this rule.
P127	Stack particulate emissions	17-11		N	N	N	N	N	N	N	N	N	PWR can not be determined so this rule does not apply.
P127	Sulfur Dioxide	18-06(E)(1)		N	N	N	N	N	N	N	N	N	Compliance is presumed because the high allowable limit determined by this rule and the inherent nature of the natural gas fuel
P127	Sulfur Dioxide < 80 lbs/ton of PWR		CFR	N	N	N	N	N	N	N	N	N	This limit is presumed to be met due to the inherent nature of the natural gas fuel.
P129	PM/PM10 (secondary baghouse) 0.01 gr/DSCF:0.27 lb PM/PM10/ hr; 1.18 tons PM/PM 10/yr		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M -Non Method 9 opacity checks required. R- visible emissions. RP- fugitive emissions. ET-opacity checks, Method 9 if required
P129	PM/PM10 (tertiary baghouse) 0.01 gr/DSCF:0.27 lb PM/PM10/ hr; 1.18 tons PM/PM 10/yr		PTI15 1339	N	Y	Y	N	N	Y	Y	N	N	M - Emission calculation required to show compliance. R- Emission calculation required to show compliance. RP- Emission calculation required to show compliance. ET-Compliance shall be determined by employing an AP-42 emission factor for CO.
P129	NSPS limits are more restrictive	17-07 (A)		N	N	N	N	N	N	N	N	N	See comments for CFR
P129	Bat restrictions more restrictive	17-11		N	N	N	N	N	N	N	N	N	See comments for PTI 15-1339
P129	Visible Particulate emissions < 10%		CFR	N	Y	Y	N	N	Y	Y	Y	N	40 Part60, Subpart Aaa, (60.27a (b)

EU = emissions unit id
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emission unit)
OR = operational restriction
M = monitoring requirements
St = steeamlining 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 requirement?

R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

C **Instructions for Part II:**

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

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

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 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 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.

J:\Engineer\Stars\SOB\timk613c.wpd