State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

10/03/07

RE: Proposed Title V Chapter 3745-77 Permit
04-48-01-0404
General Motors Corp., Toledo, OH

Attn: Stacey Coburn AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Coburn:

The proposed issuance of the Title V permit for General Motors Corp., Toledo, OH, has been created in Ohio EPA's State Air Resources System (STARS) on 10/03/07, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Toledo Div of Environmental Services
File, DAPC PIER

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 10/03/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 04-48-01-0404 to:
General Motors Corp., Toledo, OH
Attn: Environmental Supervisor
1455 West Alexis Road
Toledo, OH 43612

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1) Natural gas and #2 oil fired boiler	B003 (Boiler #3) Natural gas, land fill gas, and #2 oil fired boiler	F001 (Plant Roadways & Parking Areas) Plant roadways (paved & unpaved) and parking areas.
B002 (Boiler #2) Natural gas and #2 oil fired boiler	B004 (Boiler #4) Natural gas, land fill gas, and #2 oil fired boiler	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Toledo Div of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419) 936-3015

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility

P003- aluminum die casting;
P007 - electric aluminum melt and hold furnaces (PTI 04-140);and
T002 - #2 fuel oil storage tank (PTI 04-670).

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

F002 - aluminum dross storage;
P009 - wood shop;
Z088 - mesh belt #2;
Z089 - mesh belt #1;
Z107 - chip storage salvage - aluminum;
Z108 - chip salvage - steel;
Z109 - chip salvage - cast iron;
Z115 - storage tank #2;
Z117 - storage tank #4;
Z120 - storage tank #7;
Z121 - storage tank #8;
Z122 - storage tank #9;
Z123 - storage tank #10;
Z124 - storage tank #11;
Z125 - storage tank #12;
Z126 - storage tank #13;
Z127 - storage tank #14;
Z128 - storage tank #15;
Z129 - storage tank #16;
Z130 - storage tank #17;
Z131 - storage tank #18;
Z132 - storage tank #19;
Z133 - storage tank #20;
Z134 - storage tank #21;
Z135 - storage tank #22;
Z136 - storage tank #23;
Z137 - storage tank #24;
Z139 - storage tank #26;
Z142 - storage tank #29;
Z143 - storage tank #30;
Z144 - storage tank #31;
Z145 - storage tank #32;
Z146 - storage tank #33;
Z147 - storage tank #34;
Z148 - storage tank #35;

B. State Only Enforceable Section (continued)

Z174 - induction hardening - Reaction Internal Gear;
Z175 - induction hardening - Reaction Carrier Shaft;
Z176 - induction hardening - Output Shaft;
Z222 - diesel firefighting water pump #1;
Z224 - machining Case line 1;
Z225 - machining Case Line 2;
Z226 - machining Case Line 3;
Z039 - machining Input Carrier;
Z040 - machining Input Housing;
Z059 - machining Pump Cover;
Z060 - machining Reaction Carrier;
Z074 - machining Stator Shaft;
Z077 - machining Valve Body;
Z250 - storage Tank #36;
Z251 - induction hardening Turbine Shaft;
Z252 - maintenance painting;
Z253 - ultrasonic tester;
Z254 - Gasoline GDF with 500-gal. AST;
Z255 - Diesel GDF with 500-gal. AST;
P011- diesel-fired air compressor #1;
P012 - diesel-fired air compressor #2;
P013 - diesel-fired air compressor #3; and
P014 - diesel-fired air compressor #4.
P015 - NE diesel-fired firefighting water pump
P016 - diesel fired electrical generator - 6RWD
P017 - natural gas fired electrical generator - telephone system

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)

Activity Description: Natural gas and #2 oil fired boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
70 mmBtu/hr boiler fired with natural gas and #2 fuel oil	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btu of actual heat input
	OAC rule 3745-18-54(Y)	1.0 pound of sulfur dioxide per million Btu of actual heat input when burning #2 fuel oil

2. Additional Terms and Conditions

2.a Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or #2 fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall meet on an "as received" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound of sulfur dioxide per million Btu actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for heat content and sulfur content and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall perform or require the supplier to perform the analyses for heat content and sulfur content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or #2 fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (pound/mmBtu) for each shipment of oil received.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The deviation reports and oil analysis reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures of OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

For natural gas, the permittee may divide the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil, the permittee may divide the AP-42 (Table 1.3-1, dated 9/98) particulate emission factor of 2 pounds per thousand gallons by the #2 fuel oil higher heating value of 140 mmBtu per thousand gallons.

If required, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:

1.0 pound of sulfur dioxide per million Btu of actual heat input when burning #2 fuel oil

Applicable Compliance Method:

Compliance with this specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil, using the equation in OAC rule 3745-18-04(F)(2).

If required, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-18-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)

Activity Description: Natural gas and #2 oil fired boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
70 mmBtu/hr boiler fired with natural gas and #2 fuel oil	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btu of actual heat input
	OAC rule 3745-18-54(Y)	1.0 pound of sulfur dioxide per million Btu of actual heat input when burning #2 fuel oil

2. Additional Terms and Conditions

2.a Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or #2 fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall meet on an "as received" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound of sulfur dioxide per million Btu actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for heat content and sulfur content and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall perform or require the supplier to perform the analyses for heat content and sulfur content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. (Authority for terms III.1 - III.3: OAC rule 3745-77-07(A)(3)(a) and (b))

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or #2 fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (pound/mmBtu) for each shipment of oil received.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The deviation reports and oil analysis reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures of OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.b Emission Limitation:

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

For natural gas, the permittee may divide the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil, the permittee may divide the AP-42 (Table 1.3-1, dated 9/98) particulate emission factor of 2 pounds per thousand gallons by the #2 fuel oil higher heating value of 140 mmBtu per thousand gallons.

If required, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:

1.0 pound of sulfur dioxide per million Btu of actual heat input when burning #2 fuel oil

Applicable Compliance Method:

Compliance with this specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil, using the equation in OAC rule 3745-18-04(F)(2).

If required, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-18-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #3 (B003)

Activity Description: Natural gas, land fill gas, and #2 oil fired boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
75.5 mmBtu/hr boiler fired with natural gas, landfill gas, and #2 fuel oil	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btu of actual heat input
	OAC rule 3745-18-54(Y)	1.0 pound of sulfur dioxide per million Btu of actual heat input

2. Additional Terms and Conditions

2.a Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas, landfill gas, and/or #2 fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall meet on an "as received" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound sulfur dioxide per million Btu actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

3. The quality of the landfill gas burned in this emissions unit shall meet on an "as burned" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound sulfur dioxide per million Btu of actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, landfill gas and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for heat content and sulfur content and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall perform or require the supplier to perform the analyses for heat content and sulfur content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect or require the landfill gas supplier to collect a representative sample of the landfill gas that is received for burning in this emissions unit. Sampling shall be perfomed once per annual heating season, October through May. The permittee shall perform or require the supplier to perform analyses of each landfill gas sample for sulfur content, heat content and density in accordance with the appropriate ASTM methods. Alternative, equivalent test methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain records of the total quantity of landfill gas combusted, the permittee's or landfill gas supplier's analyses for sulfur content, heat content, density, and the calculated SO2 emission rate (in pound/mmBtu).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, landfill gas and/or #2 fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (pound/mmBtu) for each shipment of oil received.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit, once per heating season, copies of the permitee's or landfill gas supplier's analyses for the landfill gas which is received for burning in this emissions unit. The analyses shall be submitted according to the following schedule:

a. sampling conducted October through December shall be reported by January 31;

b. sampling conducted January through March shall be reported by April 30; and

c. sampling conducted April through May shall be reported by July 31.

The permittee's or landfill gas supplier's analyses shall document the sulfur content (percent by volume), heat content (Btu/cuft), density and calculated sulfur dioxide emission rate (lb/mmBtu) for each sample.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The deviation reports and fuel analysis reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures of OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

For natural gas, the permittee may divide the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil, the permittee may divide the AP-42 (Table 1.3-1, dated 9/98) particulate emission factor of 2 pounds per thousand gallons by the #2 fuel oil higher heating value of 140 mmBtu per thousand gallons.

For landfill gas, the permittee may apply the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor for natural gas. Particulate emissions may then be calculated by dividing the particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of landfill gas by the heat content (Btu/cuft) determined in the most recent analysis.

If required for natural gas, #2 fuel oil and landfill gas, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

1.0 pound of sulfur dioxide per million Btu of actual heat input

Applicable Compliance Method:

For natural gas: the exclusive combustion of commercially available natural gas shall be considered adequate demonstration of compliance with this emission limitation, or divide the AP-42 (Table 1.4-2, dated 7/98) sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil: Compliance with this specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil, using the equation in OAC rule 3745-18-04(F)(2).

For landfill gas: Compliance with this specification shall be demonstrated based upon the analytical results provided by the permittee or landfill gas supplier for the landfill gas received for burning using the equation in OAC rule 3745-18-04(F)(3).

If required, for natural gas, #2 fuel oil and landfill gas, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-18-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #4 (B004)

Activity Description: Natural gas, land fill gas, and #2 oil fired boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
75.5 mmBtu/hr boiler fired with natural gas, landfill gas, and #2 fuel oil	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btu of actual heat input
	OAC rule 3745-18-54(Y)	1.0 pound of sulfur dioxide per million Btu of actual heat input

2. Additional Terms and Conditions

2.a Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

II. Operational Restrictions

1. The permittee shall burn only natural gas, landfill gas, and/or #2 fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

2. The quality of the oil burned in this emissions unit shall meet on an "as received" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound sulfur dioxide per million Btu actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

3. The quality of the landfill gas burned in this emissions unit shall meet on an "as burned" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 pound sulfur dioxide per million Btu of actual heat input.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, landfill gas and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for heat content and sulfur content and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall perform or require the supplier to perform the analyses for heat content and sulfur content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect or require the landfill gas supplier to collect a representative sample of the landfill gas that is received for burning in this emissions unit. Sampling shall be perfomed once per annual heating season, October through May. The permittee shall perform or require the supplier to perform analyses of each landfill gas sample for sulfur content, heat content and density in accordance with the appropriate ASTM methods. Alternative, equivalent test methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain records of the total quantity of landfill gas combusted, the permittee's or landfill gas supplier's analyses for sulfur content, heat content, density, and the calculated SO2 emission rate (in pound/mmBtu).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, landfill gas and/or #2 fuel oil was burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (pound/mmBtu) for each shipment of oil received.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit, once per heating season, copies of the permitee's or landfill gas supplier's analyses for the landfill gas which is received for burning in this emissions unit. The analyses shall be submitted according to the following schedule:

a. sampling conducted October through December shall be reported by January 31;

b. sampling conducted January through March shall be reported by April 30; and

c. sampling conducted April through May shall be reported by July 31.

The permittee's or landfill gas supplier's analyses shall document the sulfur content (percent by volume), heat content (Btu/cuft), density and calculated sulfur dioxide emission rate (lb/mmBtu) for each sample.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The deviation reports and fuel analysis reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance using the methods and procedures of OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

0.020 pound of particulate emissions per million Btu of actual heat input

Applicable Compliance Method:

For natural gas, the permittee may divide the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil, the permittee may divide the AP-42 (Table 1.3-1, dated 9/98) particulate emission factor of 2 pounds per thousand gallons by the #2 fuel oil higher heating value of 140 mmBtu per thousand gallons.

For landfill gas, the permittee may apply the AP-42 (Table 1.4-2, dated 7/98) particulate emission factor for natural gas. Particulate emissions may then be calculated by dividing the particulate emission factor of 1.9 pounds of particulate emissions per million cubic feet of landfill gas by the heat content (Btu/cuft) determined in the most recent analysis.

If required for natural gas, #2 fuel oil and landfill gas, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

1.0 pound of sulfur dioxide per million Btu of actual heat input

Applicable Compliance Method:

For natural gas: the exclusive combustion of commercially available natural gas shall be considered adequate demonstration of compliance with this emission limitation, or divide the AP-42 (Table 1.4-2, dated 7/98) sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas by an average natural gas higher heating value of 1020 Btu per standard cubic foot natural gas.

For #2 fuel oil: Compliance with this specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil, using the equation in OAC rule 3745-18-04(F)(2).

For landfill gas: Compliance with this specification shall be demonstrated based upon the analytical results provided by the permittee or landfill gas supplier for the landfill gas received for burning using the equation in OAC rule 3745-18-04(F)(3).

If required, for natural gas, #2 fuel oil and landfill gas, the permittee shall demonstrate compliance using the methods and procedures provided in OAC rule 3745-18-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Plant Roadways & Parking Areas (F001)

Activity Description: Plant roadways (paved & unpaved) and parking areas.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas (see section A.I.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c, A.I.2.d, and A.I.2.f through A.I.2.j)
unpaved roadways and parking areas (see section A.I.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.e through A.I.2.j)

2. Additional Terms and Conditions

2.a All paved roadways and parking areas shall be covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08.

2.b All unpaved roadways and parking areas shall be covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08.

2.c The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water and/or sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

2.d The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements.

2.e The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's intial 1996 application, the permittee committed to speed reduction to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.f The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.g Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.h The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.i Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

2.j Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and each parking area in accordance with the following frequencies:

paved roadways and parking areas	minimum inspection frequency
all	Once per calendar month

unpaved roadways and parking areas	minimum inspection frequency
all	Once per calendar month

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. After the permitee has performed weekly inspections of the paved roadways and parking areas for one calendar quarter, which may include periods prior to issuance of this permit, and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved roadways and parking areas once per month. If visible emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per calendar week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section A.III.1.

4. After the permitee has performed weekly inspections of the unpaved roadways and parking areas for one calendar quarter, which may include periods prior to issuance of this permit and no visible particulate emissions fugitive dust have been observed, the permitee may begin inspections of the unpaved roadways and praking areas once per month. If visible emissions of fugitive dust during subsequent monthly inspections, the permitee shall return to an inspection frequency of once per calendar week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions as stated in section A.III.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in section A.III.5.d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

a. each period during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. If required, compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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