State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

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

03/11/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

13-18-53-7757
Clestra Hauserman, Inc.
JEFFREY D GORENC
29525 FOUNTAIN PARKWAY
SOLON, OH 44139

Dear JEFFREY D GORENC:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Cleveland Division of Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Cleveland Division of Air Pollution Control.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Cleveland Division of Air Pollution Control
Pennsylvania

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 03/11/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Clestra Hauserman, Inc.
29525 Fountain Parkway
Solon, OH 44139

of a Title V permit for Facility ID: 13-18-53-7757

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
K001 (PAINT LINE)
Five stage wash system and electrostatic spray booths used for painting metal office furniture components

K002 (LAMINATING LINE)
Spray booth used for the application of adhesive to metal office furniture components

K003 (FABRIC WRAP LINE)
Spray booth used for the application of adhesive to metal office furniture components and fabric/vinyl coverings

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 3745-77-04(A) 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:

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, 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.

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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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 are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and

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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

8. 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 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

Z001 HVAC Units, heaters and air conditioning units for office areas, water heater.
Z002 Plant burners, space heaters for manufacturing areas.
Z003 Plasma cutter, cut openings in light gauge sheet.
Z004 Wood shop, wood cutting with 2 saws for palletizing finished products.
Z005 Roadways/Parking, paved driveways and parking lots.
Z006 Insulation Fab, cut fiberglass and mineral fiber insulation for partition core (manual cutting).
Z007 Parts cleaning, use solvents to clean dirt, grease from painted finished goods.
Z008 Fabrication 1, sheet metal fabrication work centers for sawing, machining, and sanding.
Z009 Fabrication 2, sheet metal fabrication work centers for wire welding and resistance welding.
Z010 Paint drum washer, wash 15 gallon drums (cold solvent cleaning).
Z011 Paint gun washer, wash paint guns for manual spray (cold solvent cleaning).
Z012 Paint lab equipment including test spray booth and curing oven.
Z013 Model shop, prototyping area consisting of wood saws and metal fabrication equipment.

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 a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PAINT LINE (K001)

Activity Description: Five stage wash system and electrostatic spray booths used for painting metal office furniture components

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
Two rotational automatic electrostatic spray booths, a manual electrostatic spray booth, a drying oven, two bake ovens and a five stage wash system for painting metal furniture components on a conveyor. The three spray booths are each equipped with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-21-09 (I)	VOC content shall not exceed 3.0 pounds of volatile organic compounds (VOC) per gallon (excluding water and exempt solvents) of coating, as applied.
	40 CFR Part 60, Subpart EE, "Standards of Performance for Surface Coating of Metal Furniture"	VOC emissions shall not exceed 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.
	OAC 3745-17-07 (A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, as determined in accordance with OAC rule 3745-17-03(B)(1) (except as provided by rule).
	OAC 3745-17-11	PM emissions shall not exceed 0.68 pound per hour.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

2. The permittee shall operate all three dry filtration systems whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The kilograms of VOC per liter of coating solids, as applied, the volume of solids content, as applied, and the volume, as applied, of each coating.

c. The volume-weighted average VOC content (in kilograms of VOC per liter of coating solids, as applied) for all the coatings employed, calculated in accordance with the equations specified in Section 60.313 of 40 CFR 60 Subpart EE.

3. The permittee shall maintain daily records that document any time periods when any of the dry filtration systems was not in service when the emissions unit was in operation.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions.

b. Whether the emissions are representative of normal operations.

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions.

d. The total duration of any visible emission incident.

e. Any corrective actions taken to eliminate the visible emissions.

5. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel in this emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content, in pounds per gallon (excluding water and exempt solvents), as applied, exceeded the applicable VOC content limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar month.

2. The permittee shall submit quarterly written deviation (excursion) reports of any monthly record showing that the calculated VOC content, in kilograms per liter coating solids, exceeded the applicable VOC content limitation. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that any dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

IV. Reporting Requirements (continued)

5. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month period.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 3.0 pounds VOC per gallon (excluding water and exempt solvents) of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.b Emission Limitation: 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III.of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.c Emission Limitation: 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: Method 9 pursuant to OAC rule 3745-17-03 (B)(1).

1.d Emission Limitation: 0.68 pound PM per hour

Applicable Compliance Method: To determine the actual worst case PM emission rate, the following equation shall be used:

E = Maximum coating solids usage rate (in pounds per hour) X (1 - TE) X (1 - CE)

CE = Control efficiency of the PM emission control equipment, fraction

E = Actual PM emission rate, in pounds per hour

TE = The transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, fraction

1.e If required, emission testing shall be conducted to demonstrate compliance with the allowable emission limitation of 0.68 pound PM per hour, and the testing shall be conducted using USEPA Methods 1 to 5 of 40 CFR Part 60, Appendix A.

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
Two rotational automatic electrostatic paint spray booths, a manual electrostatic paint spray booth, a drying oven, two bake ovens and a five stage wash system are used for painting metal furniture components on conveyor. The three paint spray booths are each equipped separately with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-31-05 (PTI 13-2345 modification)	The maximum monthly coating usage shall not exceed 3,300 gallons (excluding water and exempt solvents), as applied.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record each month the total number of gallons of coatings employed (excluding water and exempt solvents).

IV. Reporting Requirements

1. The permittee shall submit quarterly written deviation (excursion) reports of any monthly record showing that the total number of gallons (excluding water and exempt solvents) of coatings, as applied, exceeded the applicable monthly coating usage limitation and shall include a copy of such record. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I.1 of these terms and conditions shall be determined by the recordkeeping specified in B.III.

Monthly Usage Limitation: 3,300 gallons (excluding water and exempt solvents) of coating, as applied

Applicable Compliance Method: VOL = Q1 + Q2 + ... + Qn = volume of all coatings (excluding water and exempt solvents) as applied, in gallons employed per month

V. Testing Requirements (continued)

1, 2 = Item number

n = Number of different coatings employed in a calendar month

Q1 = Volume of coating 1 (excluding water and exempt solvents), as applied, in gallons employed/month

Qn = Volume of the nth coating (excluding water and exempt solvents), as applied, in gallons employed/month

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATING LINE (K002)

Activity Description: Spray booth used for the application of adhesive to metal office furniture components

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
A spray booth used for the application of adhesive to metal furniture components. The spray booth is equipped with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-21-09 (I)	VOC content shall not exceed 3.0 pounds of volatile organic compounds (VOC) per gallon (excluding water and exempt solvents) of coating, as applied.
	40 CFR Part 60, Subpart EE, "Standards of Performance for Surface Coating of Metal Furniture"	VOC emissions shall not exceed 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.
	OAC 3745-17-07 (A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, as determined in accordance with OAC rule 3745-17-03(B)(1) (except as provided by rule).
	OAC 3745-17-11	PM emissions shall not exceed 0.551 pound per hour.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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

2. The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The kilograms of VOC per liter of coating solids, as applied, the volume of solids content, as applied, and the volume, as applied, of each coating.

c. The volume-weighted average VOC content (in kilograms of VOC per liter of coating solids, as applied) for all the coatings employed, calculated in accordance with the equations specified in Section 60.313 of 40 CFR 60 Subpart EE.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions.

b. Whether the emissions are representative of normal operations.

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions.

d. The total duration of any visible emission incident.

e. Any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content, in pounds per gallon (excluding water and exempt solvents), as applied, exceeded the applicable VOC content limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar month.

2. The permittee shall submit quarterly written deviation (excursion) reports of any monthly record showing that the calculated VOC content, in kilograms per liter coating solids, exceeded the applicable VOC content limitation. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month period.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 3.0 pounds VOC per gallon (excluding water and exempt solvents) of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.b Emission Limitation: 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III.of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.c Emission Limitation: 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: Method 9 pursuant to OAC rule 3745-17-03 (B)(1).

1.d Emission Limitation: 0.551 pound PM per hour

Applicable Compliance Method: To determine the actual worst case PM emission rate, the following equation shall be used:

E = Maximum coating solids usage rate (in pounds per hour) X (1 - TE) X (1 - CE)

CE = Control efficiency of the PM emission control equipment, fraction

E = Actual PM emission rate, in pounds per hour

TE = The transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, fraction

1.e If required, emission testing shall be conducted to demonstrate compliance with the allowable emission limitation of 0.551 pound PM per hour, and the testing shall be conducted using USEPA Methods 1 to 5 of 40 CFR Part 60, Appendix A.

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
A spray booth used for the application of adhesive to metal furniture components. The spray booth is equipped with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-31-05 (PTI 13-2371)	The VOC emissions shall not exceed 2.92 pounds per hour, as a daily average.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds VOC per gallon.

c. The number of gallons of each coating employed.

d. The name and identification number of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds VOC per gallon.

g. The total actual VOC emissions from all coatings and cleanup materials employed, in pounds per day.

h. The number of hours the emissions unit was in operation per day.

i. The actual VOC emissions from all coatings and cleanup materials employed (g)/(h), in pounds VOC per hour (average).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the average hourly VOC emission rate exceeded the applicable VOC limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar month.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly written reports to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. The written reports shall contain the actual emissions of VOC generated by the emissions unit expressed in pounds VOC per hour (average) for each day of operation during the quarter.

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 2.92 pounds VOC per hour, as a daily average

Applicable Compliance Method:
Recordkeeping in Section B.III.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: FABRIC WRAP LINE (K003)

Activity Description: Spray booth used for the application of adhesive to metal office furniture components and fabric/vinyl coverings

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
A spray booth used for the application of adhesive to metal furniture components and fabric/vinyl coverings. The spray booth is equipped with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-21-09 (I)	VOC content shall not exceed 3.0 pounds of volatile organic compounds (VOC) per gallon (excluding water and exempt solvents) of coating, as applied.
	40 CFR Part 60, Subpart EE, "Standards of Performance for Surface Coating of Metal Furniture"	VOC emissions shall not exceed 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.
	OAC 3745-17-07 (A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, as determined in accordance with OAC rule 3745-17-03(B)(1) (except as provided by rule).
	OAC 3745-17-11	PM emissions shall not exceed 0.551 pound per hour.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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

2. The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating, as applied.

b. The kilograms of VOC per liter of coating solids, as applied, the volume of solids content, as applied, and the volume, as applied, of each coating.

c. The volume-weighted average VOC content (in kilograms of VOC per liter of coating solids, as applied) for all the coatings employed, calculated in accordance with the equations specified in Section 60.313 of 40 CFR 60 Subpart EE.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions.

b. Whether the emissions are representative of normal operations.

c. If the emissions are not representative of normal operations, the cause of the abnormal emissions.

d. The total duration of any visible emission incident.

e. Any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content, in pounds per gallon (excluding water and exempt solvents), as applied, exceeded the applicable VOC content limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar month.

2. The permittee shall submit quarterly written deviation (excursion) reports of any monthly record showing that the calculated VOC content, in kilograms per liter coating solids, exceeded the applicable VOC content limitation. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month period.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation: 3.0 pounds VOC per gallon (excluding water and exempt solvents) of coating, as applied

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.b Emission Limitation: 0.9 kilogram VOC per liter of applied coating solids as a monthly volume-weighted average.

Applicable Compliance Method: Compliance with the VOC content limitation shall be based upon the record keeping specified in Part III, Section A.III.of this permit. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings.

1.c Emission Limitation: 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: Method 9 pursuant to OAC rule 3745-17-03 (B)(1).

1.d Emission Limitation: 0.551 pound PM per hour

Applicable Compliance Method: To determine the actual worst case PM emission rate, the following equation shall be used:

E = Maximum coating solids usage rate (in pounds per hour) X (1 - TE) X (1 - CE)

CE = Control efficiency of the PM emission control equipment, fraction

E = Actual PM emission rate, in pounds per hour

TE = The transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used, fraction

1.e If required, emission testing shall be conducted to demonstrate compliance with the allowable emission limitation of 0.551 pound PM per hour, and the testing shall be conducted using USEPA Methods 1 to 5 of 40 CFR Part 60, Appendix A.

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
A spray booth used for the application of adhesive to metal furniture components and fabric/vinyl coverings. The spray booth is equipped with a dry filtration system to control particulate matter (PM) emissions.	OAC 3745-31-05 (PTI 13-2398)	The VOC emissions shall not exceed 4.16 pounds per hour, as a daily average.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day the emissions unit is in operation:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds VOC per gallon.

c. The number of gallons of each coating employed.

d. The name and identification number of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds VOC per gallon.

g. The total actual VOC emissions from all coatings and cleanup materials employed, in pounds per day.

h. The number of hours the emissions unit was in operation per day.

i. The actual VOC emissions from all coatings and cleanup materials employed (g)/(h), in pounds VOC per hour (average).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the average hourly VOC emission rate exceeded the applicable VOC limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of each calendar month.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly written reports to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. The written reports shall contain the actual emissions of VOC generated by the emissions unit expressed in pounds VOC per hour (average) for each day of operation during the quarter.

V. Testing Requirements

1. Compliance with the emission limitation in Section B.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation: 4.16 pounds VOC per hour, as a daily average

Applicable Compliance Method:
Recordkeeping in Section B.III.

VI. Miscellaneous Requirements

None

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