

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 13-04597

**A. Source Description**

K001 is used for refinishing used automobiles. The booth is also used to cure the vehicle once it has been painted. The booth's doors are closed and the heater brings the booth's internal temperature to approximately 165 degrees Fahrenheit. There are many different potential coatings used in the booth and all calculations were based on the worst case VOC and HAP coating, which are the same. The facility has requested their permit include synthetic minor restrictions.

**B. Facility Emissions and Attainment Status**

The facility has a PTE of 43.75 tpy VOC and actual emissions of 11.85 tpy VOC. The facility PTE for HAPs is 20.94 tpy for all HAPs combined. The highest individual HAP is xylene and has a PTE of 15.62, however, actual emissions are calculated to be 4.18 tpy. Air toxics were evaluated. Xylene, toluene and n-Butyl acetate were modeled for using Screen 3 and none exceeded the predicted MAGLC.

Cuyahoga County is designated as non-attainment for ozone.

**C. Source Emissions**

The facility does not have a PTE over 100 tpy for VOC and does not emit more than 25 tpy of an combination of HAPs, however, the worst case HAP coating brings the HAP PTE for xylene over 10 tpy. Actual facility emissions calculate at 4.18 tpy for xylene.

**D. Conclusion**

Sterling Collision #33 meets Title V applicability for exceeding 10 tpy for an individual HAP, xylene. Actual emissions for the facility for xylene are significantly lower than the threshold. Air toxics have been evaluated and have not exceeded allowable concentrations. The facility will restrict HAP emissions to less than 8.0 tpy for a single HAP and 16.0 tpy for combined HAPs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No:** 13-04597

**Fac ID:** 1318038452

**DATE:** 3/21/2006

Sterling Collision Centers, Inc. No. 33  
Josh Petrash  
9 Tech Circle  
Natick, MA 01760

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

A handwritten signature in cursive script that reads "Michael W. Ahern".

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

CC: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04597 FOR AN AIR CONTAMINANT SOURCE FOR  
Sterling Collision Centers, Inc. No. 33**

On 3/21/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sterling Collision Centers, Inc. No. 33**, located at **65 Broadway Avenue, Bedford, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04597:

**Paint booth 1 -- K001.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-04597**

Application Number: 13-04597  
Facility ID: 1318038452  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Sterling Collision Centers, Inc. No. 33  
Person to Contact: Josh Petrash  
Address: 9 Tech Circle  
Natick, MA 01760

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**65 Broadway Avenue  
Bedford, Ohio**

Description of proposed emissions unit(s):  
**Paint booth 1 -- K001.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**Sterling Collision Centers, Inc. No. 33**  
**PTI Application: 13-04597**  
**Issued: To be entered upon final issuance**  
**Part I - GENERAL TERMS AND CONDITIONS**

**Facility ID: 1318038452**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting 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,

**Sterling Collision Centers, Inc. No. 33**

**Facility ID: 1318038452**

**PTI Application: 13-04597**

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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. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

**Sterling Collision Centers, Inc. No. 33**

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

**Sterling Collision Centers, Inc. No. 33**

**Facility ID: 1318038452**

**PTI Application: 13-04597**

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

**Sterli**  
**PTI A**

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	16.65
Single HAP	8.0
Combined HAPs	16.0

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PTI A**

Emissions Unit ID: **K001**

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint spray booth used for coating used automobiles.	OAC rule 3745-31-05(A)(3)	16.65 tpy VOC (including clean-up) 89.10 lbs VOC /day
	OAC Rule 3745-21-09(U)(2)(c)	Exemption for the repainting (refinishing) of used motor vehicles
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT, subpart M	See A.2.a below

**2. Additional Terms and Conditions**

- 2.a The emissions of hazardous air pollutants (HAP[s]) from emissions units K001 and K002 shall not exceed 8.0 tons per year for any single HAP and 16.0 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

1. The permittee shall use the dry exhaust filtration system to control overspray at all times this emissions unit is in operation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information daily for this emissions

**Emissions Unit ID: K001**

unit:

- a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, in pounds per gallon, as applied;
  - c. the amount, in gallons, of each coating employed;
  - d. the name and identification of each cleanup material, as applied;
  - e. the VOC content of each cleanup material, in pounds per gallon, as applied;
  - f. the amount, in gallons, of each cleanup material employed;
  - g. the total VOC emissions from all coatings employed, in pounds [summation of (b\*c) for each coating and cleanup material];
  - h. the total VOC emissions from all cleanup materials employed, in pounds [summation of (e\*f) for each coating and cleanup material]; and
  - i. the total VOC emissions from all coatings and cleanup materials employed, in pounds [summation of (g+h)].
2. The permittee shall collect and record the total daily VOC emissions from all coatings and cleanup materials for this emissions unit for the purpose of determining annual VOC emissions.
  3. The permittee shall maintain daily records and document any time periods when the dry exhaust filtration system was not in service when this emissions unit was in operation.
  4. The permittee shall collect and record the following information each month for the entire facility (K001):
    - a. the name and identification number of each HAP containing material employed;
    - b. the individual HAP content for each HAP, in pounds of individual HAP per pound of material;
    - c. the total combined HAP content, in pounds of combined HAPs per pound of material [sum all the individual HAP contents from (b)];

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- d. the number of pounds of each HAP containing material employed;
- e. the total individual HAP usage for each HAP from all HAP containing materials, in pounds or tons per month [for each HAP the sum of (b) times (d) for each material];
- f. the total combined HAP usage from all HAP containing materials, in pounds or tons per month [the sum of (c) times (d) for each material];
- g. the updated rolling, 12-month summation of usage for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI; and
- h. the updated rolling, 12-month summation of usage for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (CDAQ) contact. This information does not have to be kept on an individual emissions unit basis.

- 5. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:
  - a. Pollutant: Ethylbenzene  
TLV (mg/m<sup>3</sup>): 434.19  
Maximum Hourly Emission Rate (lb/hr): 0.64

Emissions Unit ID: **K001**

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 33.25  $\mu\text{g}/\text{m}^3$   
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 10337.91

- b. Pollutant: Xylene  
TLV ( $\text{mg}/\text{m}^3$ ): 434.19  
Maximum Hourly Emission Rate (lbs/hr): 3.58  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.3  $\mu\text{g}/\text{m}^3$   
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 10337.91
  - c. Pollutant: n-Butyl acetate  
TLV ( $\text{mg}/\text{m}^3$ ): 188.40  
Maximum Hourly Emission Rate (lbs/hr): 3.86  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 370.3  $\mu\text{g}/\text{m}^3$   
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 16967.62
  - d. Pollutant: Toluene  
TLV ( $\text{mg}/\text{m}^3$ ): 188.40  
Maximum Hourly Emission Rate (lb/hr): 0.62  
Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 59.46  $\mu\text{g}/\text{m}^3$   
MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4486
6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (inks, coatings, adhesives, or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,

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- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**Sterli****PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K001****D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ), in writing, of any daily record showing that the dry exhaust 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 CDAQ within 30 days after the event occurs.
2. The permittee shall submit a deviation (excursion) report to the CDAQ, in writing if the calculated daily VOC emission rate from K001 exceeds the allowable daily limitation of 89.10 lbs. The report shall include a copy of such record and shall be sent to the CDAQ, within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 8.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month individual HAP emissions for each such month;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 16.0 tpy based on a rolling, 12-month summation and the actual rolling, 12-month combined HAP emissions for each such month, and;
  - c. for the first 12 calendar months of operation following the issuance of this permit reports shall be submitted identifying all exceedances of the maximum allowable cumulative HAP usage and emissions rate. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation  
16.65 tpy VOC (including clean-up)

Emissions Unit ID: **K001**Applicable Compliance Method

Compliance shall be determined based on the record keeping from section C.1 and C.2. The annual emissions shall be the sum of the total VOC emissions from each day for each calendar year; [ $\sum$ C.1.i].

b. Emission Limitation

89.10 lbs VOC/day

Applicable Compliance Method

Compliance shall be determined based on the record keeping from section C.1 to determine the daily emission rate.

c. Emission Limitation

8.0 tpy single HAP

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.4 and D.3 above, respectively.

d. Emission Limitation

16.0 tpy combined HAP

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.4 and D.3 above, respectively.

**F. Miscellaneous Requirements**

None.