John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/20/2015

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Nicholas Diedrich
PINNACLE GAS PRODUCERS LLC
425 S MAIN ST
STE 201
ANN ARBOR, MI 48104

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857103154
Permit Number: P0118638
Permit Type: Initial Installation
County: Montgomery

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: RAPCA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
PINNACLE GAS PRODUCERS LLC

Facility ID:	0857103154
Permit Number:	P0118638
Permit Type:	Initial Installation
Issued:	3/20/2015
Effective:	3/20/2015
Expiration:	3/20/2020

Division of Air Pollution Control
Permit-to-Install and Operate
for
PINNACLE GAS PRODUCERS LLC

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Authorization

Facility ID:	0857103154
Application Number(s):	M0003297, A0053068
Permit Number:	P0118638
Permit Description:	Initial Installation PTIO for replacement of a natural gas-fired compressor engine that failed while still under manufacturers warranty.
Permit Type:	Initial Installation
Permit Fee:	$0.00
Issue Date:	3/20/2015
Effective Date:	3/20/2015
Expiration Date:	3/20/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

PINNACLE GAS PRODUCERS LLC
4220 PINNACLE RD
MORAINE, OH 45439

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118638
Permit Description: Initial Installation PTIO for replacement of a natural gas-fired compressor engine that failed while still under manufacturers warranty.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**B003**
Company Equipment ID:	Compressor Engine (3)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule (National Emission Standards For Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ) that the Ohio EPA does not have delegated authority to implement. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA.

C. Emissions Unit Terms and Conditions

1. B003, Compressor Engine (3)

Operations, Property and/or Equipment Description:

Natural Gas Fired Compressor Engine, 12 MMBtu/hour nominal heat input

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 160 parts per million by volume, dry (ppmvd) at 15 percent oxygen (2.0 grams/horsepower-hour (g/HP-hr)). The carbon monoxide (CO) emissions from this emissions unit shall not exceed 540 ppmvd at 15 percent oxygen (4.0 g/HP-hr). The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 86 ppmvd at 15 percent oxygen (1.0 g/HP-hr). The requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		60, Subpart JJJJ.
b.	OAC rule 3745-17-07(A)	The opacity of any visible particulate emissions from this emissions unit shall not exceed 20 percent as a six minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(5)(b)	The particulate emissions from this emissions unit shall not exceed 0.062 pound per million Btu of actual heat input.
d.	OAC rule 3745-18-06(G)	The sulfur dioxide (SO2) emissions from any stationary internal combustion engine shall not exceed 0.5 pound per million Btu of actual heat input. See b)(2)a.
e.	40 CFR Part 60, Subpart JJJJ 40 CFR 60.4233(e) and 40 CFR 60.4233(f)(4)(i)	Emissions Standards for stationary spark ignition internal combustion engines. See b)(2)b. and b)(2)c.
f.	40 CFR Part 63, Subpart ZZZZ 40 CFR 63.6590(c)(1)	Requirements for stationary reciprocating internal combustion engines (RICE) at area sources of hazardous air pollutants (HAP). See b)(2)d.

(2) Additional Terms and Conditions

a. The compressor shall be exempt from the SO2 mass emission limitation during any day in which the only fuel burned is natural gas (including pipeline quality gas concentrated from landfill gas) having a heat content of greater than 950 Btu per standard cubic foot and a sulfur content of less than 0.6 pound per million standard cubic feet.

b. The emissions standards for this emissions unit are identified in Table 1 of 40 CFR Part 60, Subpart JJJJ.

c. 40 CFR 60.4243(b)(2)(ii) - an owner or operator of a stationary spark ignition internal combustion engine greater than 500 horse power must:

i. keep a maintenance plan and records of conducted maintenance and must, to the extent practicable maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions;

ii. conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

d. 40 CFR 60.4246 – General Provisions – The applicable General Provisions of 40 CFR Parts 60.1 through 60.19 are identified in Table 3 of 40 CFR Part 60, Subpart JJJJ.

e. In accordance with 40 CFR 63.5690(c)(1) a new or reconstructed stationary RICE located at an area source of HAP must meet the requirements of 40 CFR Part 60, Subpart JJJJ. No further requirements apply under 40 CFR Part 63, Subpart ZZZZ.

c) Operational Restrictions

(1) The permittee shall burn only natural gas, or pipeline quality gas concentrated from landfill gas in this emissions unit.

(2) In the event that the landfill gas collection system is in operable, the compressor shall be shut down and all valves in the control system contributing to venting of the gas to the atmosphere shall be closed within one hour.

(3) The permittee shall maintain and operate an air/fuel mixture controller on the gas fired landfill gas compressor engine.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the type and quantity of fuel burned in the compressor engine.

(2) The permittee shall collect a representative sample of the gaseous fuel burned in this emissions unit and have it analyzed, for heat content and sulfur content. This sampling and analysis shall be completed once per calendar quarter in accordance with ASTM methods D1072, D3031, or D3246. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA district office or local air agency.

The sulfur content measurements may be reduced to semi-annually if the results of two consecutive measurements show a sulfur concentration of less than 0.45 pound per million standard cubic feet.

If any semi-annual sulfur content measurement event indicates a sulfur concentration that is in excess of 0.45 pound per million standard cubic feet the sulfur content measurements shall be completed quarterly until two consecutive quarterly monitoring events result in sulfur concentration that are less than 0.45 pound per million standard cubic feet.

(3) The permittee shall develop and maintain a quality assurance manual for the gas fired, stationary, internal combustion engine powering the landfill gas compressor and the components of the landfill gas compressor within three months after initial operation of the engine.

(4) The permittee shall maintain a log of records detailing the operation of the gas fired, stationary, internal combustion engine powering the landfill gas compressor. The records shall include:

a. any quality assurance or maintenance performed;

b. all monitoring of the engine and the engines components;

c. a record of each date and time when the engine operated outside of the quality assurance limits along with the type of fuel the engine was burning and;

d. the steps taken to correct the problem.

This log shall be available for review during regular business hours at the facility by the Director or his representatives.

(5) The permittee shall keep the following records in accordance with 40 CFR Part 60, Subpart JJJJ:

40 CFR 60.4245(a)(1)	Notifications and supporting documentation
40 CFR 60.5245(a)(2)	Maintenance conducted on the engine

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or pipeline quality gas concentrated from landfill gas was burned in the gas fired, stationary, internal combustion engine powering the landfill gas compressor. These reports shall be submitted within 30 days after the deviation occurred.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations specified in section b) shall be determined in accordance with the following methods:

a. Emissions Limitations –

The NOx emissions from this emissions unit shall not exceed 160 parts per million by volume, dry (ppmvd) at 15 percent oxygen (2.0 grams/horsepower-hour (g/HP-hr)).

The CO emissions from this emissions unit shall not exceed 540 ppmvd at 15 percent oxygen (4.0 g/HP-hr).

The VOC emissions from this emissions unit shall not exceed 86 ppmvd at 15 percent oxygen (1.0 g/HP-hr).

Applicable Compliance Method –

The permittee shall conduct, or have conducted, a performance test for emissions unit B001 in accordance with 40 CFR 60.4244 and 40 CFR 60.8:

i. conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.

ii. the performance test shall be conducted to demonstrate compliance with the allowable emission rates for N0x, CO and VOC;

iii. the following test methods of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates: for NOx: 7, 7A, 7B, or 7E; for CO: 10, or 10B and for VOC; Methods 18, 25 and/or 25A;

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

b. Emissions Limitation –

The opacity of any visible particulate emissions from this emissions unit shall not exceed 20 percent as a six minute average, except as provided by rule.

Applicable Compliance Method –

If requested, compliance shall be determined based on the results of visible emissions readings taken in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.