



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
ASHTABULA COUNTY  
Application No: 02-12057  
Fac ID: 0204010173

DATE: 8/26/2004

MFG Premier Molding Company  
Matthew Narducci  
PO Box 1000 4401 Benefit Ave  
Ashtabula, OH 44003

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 750** 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.

Very truly yours,

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

CC: USEPA NEDO Eastgate Dev. & Trans. Study NY PA

**ASHTABULA COUNTY**

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-12057** FOR AN AIR CONTAMINANT SOURCE FOR  
**MFG Premier Molding Company**

On 8/26/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **MFG Premier Molding Company**, located at **4401 Benefit Ave, Ashtabula, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-12057:

**Administrative Modification to PTI 02-2057, issued on 5/28/98 to modify certain conditions due to an ERAC appeal.**

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.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087  
[(330)425-9171]



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 02-12057**

Application Number: **02-12057**  
APS Premise Number: **0204010173**  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: **MFG Premier Molding Company**  
Person to Contact: **Matthew Narducci**  
Address: **PO Box 1000 4401 Benefit Ave  
Ashtabula, OH 44003**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4401 Benefit Ave  
Ashtabula, OHIO**

Description of modification:  
**Administrative Modification to PTI 02-2057, issued on 5/28/98 to modify certain conditions due to an ERAC appeal.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**MFG Premier Molding Company**

Facility ID: **0204010173**

**PTI Application: 02-12057**

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

## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental 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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**MFG Premier Molding Company**

Facility ID: **0204010173**

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### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

### **PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this 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 source(s) covered by this permit.

### **SOURCE OPERATION 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 permit and all applicable air pollution laws and regulations.

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**Air Emission Summary**

The air contaminant emission units listed below comprise the Permit to Install for **Molded Fiber Glass Co.** - Plant 1 located in Ashtabula County. The emission units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<b>Ohio EPA Emissions Unit No.</b>	<b>Emissions Unit Identification Description</b>	<b>BAT Determination</b>	<b>Applicable Federal &amp; OAC Rules</b>	<b>Permit Allowable Mass Emissions and/or Control/Usage Requirements</b>
P014	Compression Mold Press No. 16 for fiberglass reinforced plastic parts - administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P015	Compression Mold Press No. 19 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **

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P016	Compression Mold Press No. 22 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P017	Compression Mold Press No. 25 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P018	Compression Mold Press No. 26 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **
P019	Compression Mold Press No. 27 for fiberglass reinforced plastic parts-administrative modification of PTI 02-12057, issued on 5/28/98.	Same as permit allowable emissions.	3745-21-07(G)(2) 3745-31-05(A)(3) 40 CFR63, Subpart WWWW	* 8 lbs/hr, 40 lbs/day and 7.3 TPY of OC emissions. **

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\* The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

\*\* This source shall demonstrate compliance with all applicable requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 62, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.

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**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	43.8

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Introduction:**

The facility makes fiberglass reinforced plastic (FRP) parts. The application is for 5 mold presses installed between 1987 and 1994 (P014 - P018) and , P019 was installed on October 1, 1998 . The OC/VOC emissions from all operations consist of styrene only.

**B. Operational Restrictions:**

1. The mold presses (P014 through P019) shall demonstrate compliance with all applicable operational restrictions contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the each of the mold presses (P014-P019):
  - a. The company identification for each mold compound employed;
  - b. The number of pounds of each mold compound employed;
  - c. The total number of hours each emissions unit was in operation;
  - d. The total organic compound emission rate for all mold compounds employed, in pounds per day; and
    - e. The average hourly organic compound emission rate, i.e., (d)/(c), in pounds per hour (average).
2. The mold presses (P014 through P019) shall demonstrate compliance with all applicable monitoring and record keeping requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWWW for Reinforced Plastic

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Composites Production by April 21, 2006.

3. The Air Toxic Policy Clarifying Language term and conditions as specified below in sections C.4 to C.6 shall become inapplicable upon the permittee certifying compliance with final National Emission Standard for Hazardous Air Pollutants (NESHAP) for reinforced plastic Composites Production, 40 CFR 63, Subpart WWWW.
4. Air Toxic Policy Clarifying Language

The permit-to-install for the mold presses (P014 through P019) 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(s):

Emissions Unit: P014

Pollutant: Styrene

Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000

Maximum Hourly Emission Rate (pounds/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1

Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

Emissions Unit: P015

Pollutant: Styrene

Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000

Maximum Hourly Emission Rate (pounds/hr): 8.0

Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1

Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

Emissions Unit: P016

Pollutant: Styrene

Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000

Maximum Hourly Emission Rate (pounds/hr): 8.0

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Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1

Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

Emissions Unit: P017

Pollutant: Styrene

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Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000  
Maximum Hourly Emission Rate (pounds/hr): 8.0  
Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1  
Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

Emissions Unit: P018  
Pollutant: Styrene

Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000  
Maximum Hourly Emission Rate (pounds/hr): 8.0  
Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1  
Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

Emissions Unit: P019  
Pollutant: Styrene

Threshold Limit Value (TLV) ( $\mu\text{g}/\text{m}^3$ ): 213,000  
Maximum Hourly Emission Rate (pounds/hr): 8.0  
Predicted 1 Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 343.1  
Maximum Acceptable Ground Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ ): 5,071

5. 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 still 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 (typically for coatings 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,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

6. 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(AAA)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (AAA)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports to the Ohio EPA Northeast District Office which identify all exceedances. The reports shall include the following information:
  - a. statement(s) noting the allowable emissions limit(s) for organic compounds, in pounds per hour and pounds per day, as specified in the Air Emission Summary for each emissions unit;
  - b. an identification of each day during which the average hourly organic compound emission rate exceeded 8 pounds per hour, and the actual average hourly emission rate, in pounds per hour, for each such day from any of the following emissions unit(s): P014-P019;
  - c. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual emission rate in pounds per day for each such day from any of the following emissions unit(s): P014-P019; and
  - d. description of any corrective actions taken to address any exceedance of any emission limitation.

The excursion reports shall be submitted quarterly, i. e., by January 31, April 30, July 31 and

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October 31 of each year and shall cover the previous calendar quarters. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC Rule 3745-15-06.)

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2. The permittee shall submit an annual report to the Ohio EPA Northeast District Office which includes the following information: the OC emissions for the previous calendar year from each emissions units P014-P019.

This report shall be submitted by April 15 of each year.

3. The mold presses (P014 through P019) shall demonstrate compliance with all applicable reporting requirements contained in the final Maximum Achievable Control Technology (MACT) standards found in 40 CFR 63, Subpart WWWW for Reinforced Plastic Composites Production by April 21, 2006.

**E. Testing Requirements:**

1. Compliance with the emissions limitation(s) in Air Emission Summary of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation: 8 lbs OC/hr

Applicable Compliance Method: To calculate organic compound emissions from each of the mold presses (P014-P019) compliance shall be determined based upon the record keeping specified in C.1. e. of this permit.

- b. Emission Limitation: 40 lbs OC/day

Applicable Compliance Method(s): To calculate organic compound emissions from each of the mold presses (P014-P019) for purposes of determining compliance with the applicable emission limitations of this permit, the permittee shall employ the following:

- i. Determination of total, daily organic compound emissions for all mold compounds:

$$E(\text{lbs/day}) = \Sigma(W_i \times EF)$$

$E(\text{lbs/day})$  = total, daily, organic compound emissions, in pounds per day.

$W_i$  = the weight of mold compound "i" employed, in pounds per day.

$EF(\text{mold press})$  = the organic compound emission factor, which is 0.00134 pound per pound of mold compound, as determined from test data from the Society of Plastics Industry.

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c. Emission Limitation: 7.3 TPY OC

Applicable Compliance Method(s): To calculate organic compound emissions from each of the mold presses (P014-P019) compliance shall be based on the record keeping specified in Term C.1. d. of this permit and shall be the sum of the daily OC emission rates for the calendar year.

2. Any determination of styrene content or other organic compound content (percent by weight), solids content, or density of a material shall be based on the material as employed, including the addition of any thinner or viscosity reducer to the material. The permittee shall determine the composition of the material by formulation data supplied by the manufacturer or from data determined by an analysis of each material, as received, by U.S. EPA Reference Method 24 as referenced in 40 CFR Part 60, Appendix A. If formulation data is employed, the Ohio EPA may require the permittee to have a Reference Method 24 analysis or an equivalent, alternative method (as approved by Ohio EPA) performed on the material(s).

**F. Miscellaneous Requirements:**

None.