



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
LAKE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22020

Fac ID: 0243081245

DATE: 6/27/2006

ChemDevelopment Inc
Jim Duvall
9349 Hamilton Drive
Mentor, OH 44060

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/27/2006
Effective Date: 6/27/2006**

FINAL PERMIT TO INSTALL 02-22020

Application Number: 02-22020
Facility ID: 0243081245
Permit Fee: **\$200**
Name of Facility: ChemDevelopment Inc
Person to Contact: Jim Duvall
Address: 9349 Hamilton Drive
Mentor, OH 44060

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9349 Hamilton Drive
Mentor, Ohio**

Description of proposed emissions unit(s):
PC-4 Research and Development Pilot Coater.

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

Part I - GENERAL TERMS AND CONDITIONS

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, 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)

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

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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

Emissions Unit ID: **K004**

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	99.0 TPY (from all coating lines; K001 through K004); 5.48 tons per year from K004
Individual HAPs	9.9 TPY (from all coating lines; K001 through K004)
Total HAPs	24.90 TPY (from all coating lines; K001 through K004)

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- 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.

Operations, Property, and/or Equipment - (K004) - Busch Research and Development Pilot Coater (PC-4)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	VOC emissions from this emissions unit, including cleanup, shall not exceed 30.0 lbs per day and 5.48 tons per year.
OAC rule 3745-31-05(C)	Based on rolling, 12 month summations, facility-wide, for this emissions unit and all other non-trivial emissions units [Pilot coater lines 1-4; (emissions units K001 through K004)] the following limits apply: the maximum annual individual and total HAP(s) emissions, shall not exceed 9.9 tons per year and 24.9 tons per year, respectively; and the maximum annual VOC emissions shall not exceed 99.0 tons per year.
OAC rule 3745-21-09(F) and OAC rule 3745-21-09(G)	The VOC content for any coating employed in this emissions unit shall not exceed 2.9 pounds per gallon, based on a daily volume weighted average, as applied to paper and/or fabric, excluding water and exempt solvents.
40 CFR Part 60, Subpart RR (NSPS)	The permittee shall not discharge VOC emissions into the atmosphere of more than 0.2 kg of VOC per kg of coating solids applied, calculated as a mass weighted average for each month.
OAC rule 3745-21-07(G)(2)	While coating plastic, the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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2. Additional Terms and Conditions**2.a** This emissions unit is subject to the following MACTs:

40 CFR Part 63 Subpart JJJJ (Paper and Other Web Coating)
 40 CFR Part 63 Subpart OOOO (Fabric Coating)
 40 CFR Part 63 Subpart DDDDD (Boilers and Process Heaters),

however through federally enforceable facility-wide (K001 through K004) restrictions of emissions through material usage, resulting in synthetic minor status, there are no applicable requirements.

B. Operational Restrictions

1. Based on rolling, 12 month summations, the maximum annual individual and total HAP(s) emissions, facility-wide, for this emissions unit and all other non-trivial emissions units (emissions units K001 through K003) shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Based on rolling, 12 month summations, the maximum annual VOC emissions, facility-wide, for this emissions unit and all other non-trivial emissions units (emissions units K001 through K003) shall not exceed 99.0 tons per year.

2. The weight of VOCs applied/used at this facility shall not exceed 99.0 tons per rolling 12 months, calculated using the following formula:

$$99.0 \text{ tons VOC} \geq \sum_{i=1}^n \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of the coating and cleanup material i , in gallons during the last 12 months

VOC_i = volatile organic compound content of all coating i , cleanup material i , in pounds per gallon.

To ensure enforceability during the first twelve (12) calendar months of operation following the effective date of this permit to install, the permittee shall not exceed the following Volatile Organic Compound (VOC) levels, individual Hazardous Air Pollutants (HAP) levels and total HAPs levels for all coating lines (emissions units K001 through K004):

Emissions Unit ID: **K004**

Month(s) following PTI effective date	Maximum allowable VOC cumulative emissions including cleanup (in tons)	Maximum allowable individual HAP cumulative emissions including cleanup (in tons)	Maximum allowable total HAPs cumulative emissions including cleanup (in tons)
1	9.0	0.90	2.25
1-2	18.0	1.8	4.50
1-3	27.0	2.7	6.75
1-4	36.0	3.6	9.00
1-5	45.0	4.5	11.25
1-6	54.0	5.4	13.50
1-7	63.0	6.3	15.75
1-8	72.0	7.2	18.00
1-9	81.0	8.1	20.25
1-10	90.0	9.0	22.50
1-11	98.9	9.9	24.75
1-12	99.0	9.9	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance shall be based upon a rolling, 12-month summation of VOC, individual HAP and total HAPs emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating lines PC-1 through PC-4 (emissions units K001-K004):
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating/cleanup material, as applied;
 - d. the total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of coating/cleanup material, as applied [sum all the individual HAP contents per gallon of coating from (b)];

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- e. the number of gallons of each coating and cleanup material employed;
- f. the total VOC emissions from all coatings and cleanup materials, in pounds and tons per month;
- g. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds per month [for each HAP (c) times (e) for each coating and cleanup material];
- h. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds per month [(d) times (e) for each coating and cleanup material];
- i. the updated rolling, 12-month summation of the emissions for each individual HAP, in pounds. This shall include the information for the current month and the preceding eleven calendar months;
- j. the updated rolling, 12-month summation of the emissions for total combined HAPs, in pounds. This shall include the information for the current month and the preceding eleven calendar months; and
- k. the updated rolling, 12-month summation of the emissions of VOCs, in pounds and tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act , on the Ohio EPA website or can be obtained by contacting your Northeast District Office contact. This information does not have to be kept on a line-by-line basis.

- 2. The permittee shall collect and record the following information each day for this emissions unit PC-4 (emissions unit K004):
 - a. the name and identification number of each coating and cleanup material employed;
 - b. (See C.1.b.)
 - c. the number of gallons of each coating and cleanup material employed; (See C.1.e.); and

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- d. the total VOC emissions from all coatings and cleanup materials, in pounds per day.
3. The permittee shall collect and record the following information each month for this emissions unit:
- a. The name and identification number of each coating employed;
 - b. The weighted average of the mass of solvent (VOC) used per mass of coating solids applied, in kg VOC/kg coating solids applied, calculated in accordance with the equation in section 60.443(a)(2) of 40 CFR 60, Subpart RR, and as follows:
 - i. The weight fraction of volatile organic compounds and the weight fraction coating solids of each coating applied shall be determined by 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA. In accordance with the USEPA's written approval of February 11, 1998, GCMS, Capillary Column Technique Method 8260A may be used to determine the VOC content of the water-based coatings, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A.
 - ii. The weighted average (G) shall be calculated using the following equation:

$$G = (TWM_o) / (TWM_s)$$

Where

$$TWM_o = \sum_{i=1}^n (W_{oi} \times M_{ci})_i$$

(TWM_o = the sum, from i = 1 to i = n, of (W_{oi} x M_{ci})_i); and

$$TWM_s = \sum_{i=1}^n (W_{si} \times M_{ci})_i$$

(TWM_s = the sum, from i = 1 to i = n, of (W_{si} x M_{ci})_i)

Emissions Unit ID: **K004**

i = subscript denoting an individual coating

n = the number of different coatings employed

M_{ci} = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

W_{oi} = the weight fraction of volatile organic compounds of each coating (i) applied during the calendar month as determined by Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data.

W_{si} = the weight fraction of coating solids of each coating (i) applied during the calendar month as determined by Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data.

4. The permittee shall collect and record the following information daily for all coatings employed in this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating employed, in pounds per gallon;
 - c. the total number of gallons of each coating employed; and
 - d. the VOC content of each coating in pounds per gallon, based on a daily volume weighted average, as applied.

5. The permit to install for this emissions unit K004 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Toluene

TLV (mg/m³): 188 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 1.25 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 394.4 ug/m³MAGLC (ug/m³): 4486.32 ug/m³

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - 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 exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. 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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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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 the 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 Director (the Northeast District of the Ohio EPA) which include the following information for this emissions unit:
 - a. an identification of each day during which the daily VOC emissions exceeded 30.0 lbs;
 - b. an identification of any record indicating that the rolling 12-month summation of VOC emissions, or the annual VOC emissions exceeded 99.0 tons year, and the actual rolling 12-month summation and/or the actual annual VOC emissions;
 - c. an identification of any record indicating that the rolling 12-month summation of any individual HAP exceeded 9.9 tons year, and the actual rolling 12-month summation; and
 - d. an identification of any record indicating that the rolling 12-month summation total HAPs, facility-wide, exceeded 24.9 tons year, and the actual rolling 12-month summation of total HAP emissions;
- c. an identification of each month during which the mass-weighted average VOC emissions from coatings exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions from coatings in kg VOC per kg of coating solids applied, for each such month;
- d. an identification of any record indicating that the VOC content of any coating used in this emissions unit exceeded 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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E. Testing Requirements

1. Compliance with the emissions limits in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
2.9 pounds of VOC per gallon of coating, as applied

Applicable Compliance Method

Compliance shall be determined based upon the record keeping requirements specified in section C.4 of these terms and conditions. In accordance with OAC rule 3745-21-04 (B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings.

- b. Emission Limitation:
30.0 pounds per day VOC, including cleanup, and 99.0 tons VOC, facility-wide, per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Section C.2. and C.4. of these terms and conditions.

- c. Emission Limitation:
9.9 tons of any individual HAP, facility-wide, per rolling 12-month period

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Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Section C.1. of these terms and conditions.

- d. Emission Limitation:
24.9 tons of total HAPs, facility-wide, per rolling 12-month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Section C.1. of these terms and conditions.

- d. Emission Limitation

The permittee shall not discharge into the atmosphere emissions of more than 0.20 kg VOC/kg coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method

Compliance shall be based upon the on the record keeping requirements in Section C.3. of these terms and conditions.

F. Miscellaneous Requirements

All terms and conditions of this permit are Federally Enforcement except those related to Air Toxic Modeling (Section C.5 through C.7).