

Facility ID: 0278020021 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

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

P003 - Paint Line Washer and Dry-Off Oven, Five Stage Washer
P004 - Gas-Fired Heat Treat Oven #1
P005 - Gas-Fired Heat Treat Oven #2
P006 - Aluminum Billet Heating Furnace and Press, Heater #1 and Youngstown #2
P007 - Aluminum Billet Heating Furnace and Press, Heater #2 and Erie #1
P008 - Aluminum Billet Heating Furnace and Press, Heater #3 and Youngstown #3
P009 - Five Stage Aluminum Parts Washer #2
Z008 - 2000 Gallon Xylene Tank
Z009 - 2000 Gallon Xylene Tank

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278020021 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum Extrusion Electrostatic Spray System, Surface Coating Line and Bake Oven With Thermal Reoxidizer Line #1 (K002)	OAC 3745-21-09 (U)	less stringent than 3745-21-09(B)(6)
	OAC 3745-21-09(B)(6)	see A.I.2.a

2. Additional Terms and Conditions

- a. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC 3745-21-09, the permittee shall comply with the provisions of OAC 3745-21-09(B)(6) and shall operate and maintain a thermal incinerator capable of capturing and controlling VOC emissions from line K002.
- (a) The VOC capture and control equipment shall provide not less than an 81% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the control equipment.

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 years after permit issuance and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC capture efficiency and control efficiency requirements specified in Section A.I.2.a.
 - c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office .
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office . 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast 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.
2. 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 Ohio EPA Northeast District within 30 days following completion of the test(s).
3. The VOC content of each coating used shall be based upon the use of USEPA Method 24 .

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278020021 Emissions Unit ID: K002 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum Extrusion Electrostatic Spray System, Surface Coating Line and Bake Oven With Thermal Reoxidizer Line #1 (K002)		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
 - h. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278020021 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum Extrusion Electrostatic Spray System, Surface Coating Line and Bake Oven With Thermal Reoxidizer Line #2 (K003)	OAC 3745-31-05 PTI N0. 02-7295	see A.I.2.a,b,and c
	OAC 3745-21-09 (B)(6) and (U)	less stringent than the BAT requirements specified in A.I.2.b

2. **Additional Terms and Conditions**

- a. The volatile organic compound (VOC) content shall not exceed 6.0 pounds VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
- b. The permittee shall operate and maintain a VOC capture system (for spray booths, flash-off areas and bake oven) that shall provide not less than an 95% capture of VOC emissions and a control system (thermal incinerator) that shall provide an efficiency (percent destruction) of not less than 95%, by weight, for VOC emissions vented to the control equipment.
- c. The permittee shall not exceed maximum allowable VOC emissions of 9.11 pounds per hour, 6,636 pounds per month, and 39.8 tons per year, as required by the synthetic minor permit to install.

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II. **Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any

modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - c. The number of hours per day the coating line operated.
3. The permittee shall collect and record the following information each day:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon and in pounds per gallon excluding water and exempt solvents.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
 - h. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds per day and in tons per year (year to date). The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - i. The average hourly VOC emission rate in pounds of VOC per hour. This shall be calculated by dividing 3 (h) by 2(c) for each day.
 - j. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
4. The permittee shall collect and record the following information each month:
 - a. The total days of operation of the coating line.
 - b. The total, controlled VOC emission rate for all coatings and cleanup materials.

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IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
 - c. A list of all months where the VOC emission rate exceeded 6,636 pounds of VOC .
 - d. A list of all days where the average hourly VOC emission rate exceeded 9.11 pounds of VOC .

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

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V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 2 years after permit issuance and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC capture efficiency and control efficiency requirements specified in Section A.I.2.a.
 - c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office .
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office . 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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.
2. 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 Ohio EPA Northeast District Office within 30 days following completion of the test(s).
3. Emission Limitation-
6,636 pounds per month and 39.8 tons per year of VOC

Applicable Compliance Method -
Compliance shall be based upon the recordkeeping specified in Section A.III.3 and A.III.4.
4. The VOC content of each coating used shall be based upon the use of USEPA Method 24 .
5. Emission Limitation-
9.11 pounds per hour average VOC emission rate

Applicable Compliance Method -
Compliance shall be based upon the recordkeeping specified in Section A.III and the emission testing specified in Section A.V.1.
6. Emission Limitation-
6.0 pounds VOC per gallon of coating, excluding water and exempt solvent, on a daily volume-weighted average.

Applicable Compliance Method -
Compliance shall be based upon the recordkeeping specified in Section A.III.3 .

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278020021 Emissions Unit ID: K003 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Aluminum Extrusion Electrostatic Spray System, Surface Coating Line and Bake Oven With Thermal Reoxidizer Line #2 (K003)		

2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None