State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
BUTLER COUNTY
Application No: 14-06027
Fac ID: 1409000411

DATE: 4/10/2008

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Shepherd Color Company
Gary Strassell
4539 Dues Drive
Cincinnati, OH 45246

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 of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 4/10/2008**
Terms and Conditions	**Effective Date: 4/10/2008**

FINAL PERMIT TO INSTALL 14-06027

Application Number:	14-06027
Facility ID:	1409000411
Permit Fee:	**$1000**
Name of Facility:	Shepherd Color Company
Person to Contact:	Gary Strassell
Address:	4539 Dues Drive Cincinnati, OH 45246

Location of proposed air contaminant source(s) [emissions unit(s)]:
4539 Dues Drive
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Increase the throughput and emissions for EU P049 and P066.

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

Chris Korleski
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 (i.e., postmarked) quarterly 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)

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.

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 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

Pollutant	Tons Per Year
PE/PM10	0.044
NOx	2.07
CO	1.71
VOC	0.22

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P049) - 725 lb/hr fluid bed dryer with HEPA filter

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See term and condition A.2.a.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	See term and condition A.2.b.
OAC rule 3745-18-06(B)	See term and condition A.2.c.
OAC rule 3745-21-08	See term and condition A.2.d.

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10), volatile organic compound (VOC), sulfur dioxide (SO_2), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than 10 tons per year.

2.b The PE from the outlet of the HEPA filter system controlling emissions unit P049 shall not exceed 3.7 pounds per hour, based on Table I in OAC rule 3745-17-11(B).

2.c Exempt due to burning natural gas with propane back-up at a maximum rated heat input capacity less than ten MM Btu per hour.

2.d The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and

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the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

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

a. Emission Limitation:
The PE/PM10, VOC, SO_2, NO_x and CO emissions from this emissions unit shall not exceed 10.0 tons per year, for each pollutant.

Applicable Compliance Method:
The annual emissions for VOC, SO_2, NO_x and CO are determined by multiplying the annual amount of natural gas used, in 10^6 scf/yr, by the associated emissions factor, 5.5 lbs/10^6 scf (VOC), 0.6 lbs/10^6 scf (SO2), 100 lbs/10^6 scf (NOx), and 84 lbs/10^6 scf (CO), respectively (from AP-42 Table 1.4-1, 7/98), then dividing by 2000 lbs/ton.

The annual emissions for PE/PM10 are determined by calculating the sum of the annual amount of dry material throughput, in lbs, (as provided in PTI application 14-06027, submitted on February 25, 2008) then multiplied by one minus the control efficiency (99%) of the product collector then multiplied by one minus the control efficiency (99%) of the HEPA filter system, and the annual amount of natural gas

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used, in 10^6 scf/yr, multiplied by the emission factor of 7.6 lbs PM (Total)/10^6 scf (from AP-42 Table 1.4-2, 7/98), then dividing by 2000 lbs/ton. All PE is assumed to be PM10.

b. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:
The PE from the outlet of the HEPA filter system controlling emissions unit P049 shall not exceed 3.7 pounds per hour.

Applicable Compliance Method:
If required, compliance with the hourly PE limitation shall be demonstrated through an emission source test performed in accordance with the requirements of 40 CFR Part 60, Appendix A, Methods 1 - 5.

F. Miscellaneous Requirements

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 14-05522 issued on 1/22/2004.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P066) - 725 lb/hr fluid bed dryer with HEPA filter

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See term and condition A.2.a.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-11(B)	See term and condition A.2.b.
OAC rule 3745-18-06(B)	See term and condition A.2.c.
OAC rule 3745-21-08	See term and condition A.2.d.

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter emissions 10 microns and less in diameter (PM10), volatile organic compound (VOC), sulfur dioxide (SO_2), nitrogen oxides (NO_x), and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than ten tons per year.

2.b The PE from the outlet of the HEPA filter system controlling emissions unit P066 shall not exceed 3.7 pounds per hour, based on Table I in OAC rule 3745-17-11(B).

2.c Exempt due to burning natural gas with propane back-up at a maximum rated heat input capacity less than ten MM Btu per hour.

2.d The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and

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the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

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

a. Emission Limitation:
The PE/PM10, VOC, SO_2, NO_x and CO emissions from this emissions unit shall not exceed 10.0 tons per year, for each pollutant.

Applicable Compliance Method:
The annual emissions for VOC, SO_2, NO_x and CO are determined by multiplying the annual amount of natural gas used, in 10^6 scf/yr, by the associated emissions factor, 5.5 lbs/10^6 scf (VOC), 0.6 lbs/10^6 scf (SO2), 100 lbs/10^6 scf (NOx), and 84 lbs/10^6 scf(CO), respectively (from AP-42 Table 1.4-1, 7/98), then dividing by 2000 lbs/ton.

The annual emissions for PE/PM10 are determined by calculating the sum of the annual amount of dry material throughput, in lbs, (as provided in PTI application 14-06027, submitted on February 25, 2008) then multiplied by one minus the control efficiency (99%) of the product collector then multiplied by one minus the control efficiency (99%) of the HEPA filter system, and the annual amount of natural gas

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used, in 10^6 scf/yr, multiplied by the emissions factor 7.6 lbs PM (Total)/10^6 scf (from AP-42 Table 1.4-2, 7/98), then dividing by 2000 lbs/ton. All PE is assumed to be PM10.

b. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:
The PE from the outlet of the HEPA filter system controlling emissions unit P066 shall not exceed 3.7 pounds per hour.

Applicable Compliance Method:
If required, compliance with the hourly PE limitation shall be demonstrated through an emissions source test performed in accordance with the requirements of 40 CFR Part 60, Appendix A, Methods 1 - 5.

F. Miscellaneous Requirements

1. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 14-06003 issued on 1/03/2008.

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Shepherd Color Company **Facility ID: 1409000411**
PTI Application: 14-06027
Issued: 4/10/2008

SIC CODE 2816 SCC CODE 3-01-035-53 EMISSIONS UNIT ID P049

EMISSIONS UNIT DESCRIPTION 725 lb/hr fluid bed dryer with HEPA filter

DATE INSTALLED 3/2004

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.0054 lb/hr	0.021	3.7 lb/hr	< 10
PM_{10}		0.0054 lb/hr	0.021	3.7 lb/hr	< 10
Sulfur Dioxide		0.0028 lb/hr	0.006		< 10
Organic Compounds		0.042 lb/hr	0.11		< 10
Nitrogen Oxides		0.398 lb/hr	1.01		< 10
Carbon Monoxide		0.214 lb/hr	0.85		< 10
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Potential emissions for this unit are less than 10 tons per year, therefore BAT does not apply.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

Shepherd Color Company **Facility ID: 1409000411**
PTI Application: 14-06027
Issued: 4/10/2008

SIC CODE 2816 SCC CODE 3-01-035-53 EMISSIONS UNIT ID P066

EMISSIONS UNIT DESCRIPTION 725 lb/hr fluid bed dryer with HEPA filter

DATE INSTALLED After PTI received

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.0054 lb/hr	0.021	3.7 lb/hr	< 10
PM_{10}		0.0054 lb/hr	0.021	3.7 lb/hr	< 10
Sulfur Dioxide		0.0028 lb/hr	0.006		< 10
Organic Compounds		0.042 lb/hr	0.11		< 10
Nitrogen Oxides		0.398 lb/hr	1.01		< 10
Carbon Monoxide		0.214 lb/hr	0.85		< 10
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Potential emissions for this unit are less than 10 tons per year, therefore BAT does not apply.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

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