



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/9/2012

Dennis Rhodes
Technibus, Inc.
1501 RAFF ROAD SW
Canton, OH 44710

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576051550
Permit Number: P0109326
Permit Type: Initial Installation
County: Stark

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Canton



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Technibus, Inc.**

Facility ID:	1576051550
Permit Number:	P0109326
Permit Type:	Initial Installation
Issued:	2/9/2012
Effective:	2/9/2012
Expiration:	2/9/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
Technibus, Inc.

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Authorization

Facility ID: 1576051550

Application Number(s): A0043553

Permit Number: P0109326

Permit Description: Initial installation of a liquid coating spray booth at Technibus, Inc. for miscellaneous metal parts limited to 10 gal/day of coatings. Includes one 1.65 mmBtu/hr direct-fired natural gas make-up air unit to provide heated air (17,000 cfm, 180 deg F max.) to reduce coating drying time. Particulate emissions are controlled by a 97% efficient passive dry filter.

Permit Type: Initial Installation

Permit Fee: \$200.00

Issue Date: 2/9/2012

Effective Date: 2/9/2012

Expiration Date: 2/9/2022

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

This document constitutes issuance to:

Technibus, Inc.
1501 RAFF ROAD SW
Canton, OH 44710

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

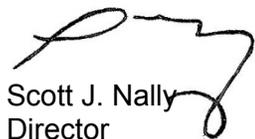
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109326

Permit Description: Initial installation of a liquid coating spray booth at Technibus, Inc. for miscellaneous metal parts limited to 10 gal/day of coatings. Includes one 1.65 mmBtu/hr direct-fired natural gas make-up air unit to provide heated air (17,000 cfm, 180 deg F max.) to reduce coating drying time. Particulate emissions are controlled by a 97% efficient passive dry filter.

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

Emissions Unit ID:	K004
Company Equipment ID:	IPB Coating Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (2) 2.
2. The permittee has stated in the permit application that this facility spray-applies coatings that contain compounds of chromium, which are among the target hazardous air pollutants (HAPs) defined in 63.11180 under the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Metal Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. This rule may be applicable to the following emissions unit(s) contained in this permit: K004.

Ohio EPA does not have the delegated authority to implement and enforce this area source standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:
<http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions



1. K004, IPB Coating Spray Booth #1

Operations, Property and/or Equipment Description:

Liquid coating spray booth for coating miscellaneous metal parts, including one 1.65 mmBtu/hr direct-fired natural gas make-up air unit to provide heated air (17,000 cfm, 180 deg F max.) to reduce coating drying time. Particulate emissions are controlled by a 97% efficient passive dry filter.

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

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

a. b)(1)h., d)(10) – d)(13) and e)(6)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: ORC 3704.03(T) [Best Available Technology (BAT) via SB265] - Volatile organic compound (VOC) emissions shall not exceed 13.65 tons per year... Row b: OAC rule 3745-31-05(A)(3) , as effective 11/30/2001 [Best Available Technology (BAT)] - Filterable particulate emissions (PE)* shall not exceed 0.28 lb/hr and 0.3 tons per year. Nitrogen oxides (NOx) emissions shall not exceed 0.15 lb/hr and 0.67 tons per year. Carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.31 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., b)(2)c. – b)(2)d., and c)(1) – c)(3) below. The requirements established pursuant to this rule also include the requirements of OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-17-11(C).
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 [Less than 10 ton/yr BAT exemption]	See b)(2)e. below.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	The permittee shall not use more than 10 gallons of coating material per day in this emissions unit.
e.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitations established pursuant to this rule do not apply to this emissions unit because it is not subject to any mass emission limitation in any of the rules listed in OAC rule 3745-17-07(A)(3)(h). [More specifically, because this emissions unit is a surface coating process, it is not subject to any mass emission limitation in OAC rule 3745-17-11(B).]
f.	OAC rule 3745-17-11(C)	The control measure and work practice requirements established pursuant to this rule are equivalent to the control measure and work practice requirements established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001. See b)(2)e. below.
g.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the uncontrolled potential-to-emit for the natural gas fuel burning equipment in this emissions unit. See f)(1)g. below.
h.	OAC rule 3745-114 and ORC 3704.03(F)	See d)(10) – d)(13) and e)(6) below.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀).

- (2) Additional Terms and Conditions
- a. The hourly and annual mass emissions limitations specified in b)(1)b. above for PE are based on the emissions unit's potential-to-emit with controls, and the hourly and annual mass emissions limitations specified in b)(1)b. above for NOx and CO are based on the emissions unit's uncontrolled potential-to-emit. Therefore, for the pollutants listed in this paragraph, no monitoring, recordkeeping or reporting requirements are necessary to ensure compliance with these limitations.
 - b. Compliance with ORC 3704.03(T), shall also be demonstrated as follows:
 - i. compliance with Monitoring and/or Recordkeeping Requirements d)(1) and d)(2) below.
 - c. Compliance with OAC rule 3745-31-05(A)(3), shall also be demonstrated as follows:
 - i. the use of a fabric filter on the spray booth to control particulate emissions in compliance with the visible emissions limitation and mass emissions limitations;
 - ii. compliance with Operational Restrictions c)(1) -- c)(3) below; and
 - iii. compliance with Monitoring and/or Recordkeeping Requirements d)(3) thru d)(9) below.
 - d. With the emissions limits and control measures mentioned in term b)(1) b. above, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform with ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for sources having potential to emit, taking into account controls, less than ten tons per year of emissions of an NAAQS pollutant or precursor. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exist as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then the emission limits above under b)(1)b. no longer apply to PE/PM₁₀^{*}, NOx and CO emissions – see next section, b)(2)e.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀)
 - e. This term only applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. In that case only, the following Terms and Conditions will apply instead of those listed under b)(1)b.:

- i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM₁₀* emissions from this emissions unit since the calculated annual emission rate for PE/PM₁₀* is less than 10 tons per year taking into account the controls described in term c)(1) – c(2) below.
 - ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x and CO emissions from this emissions unit since the calculated annual emission rate for NO_x and CO is less than 10 tons per year.
 - iii. Control measures and work practices shall be utilized as described in terms c)(1) – c(2) and d)(3) -- d)(7) below, not as BAT requirements, but rather as compliance with the requirements of OAC rule 3745-17-11(C), requirements for surface coating processes. [Note: because this emissions unit is a surface coating process, OAC rule 3745-17-11(C) applies instead of OAC rule 3745-17-11(B).]
 - iv. Operational Restriction c)(3) shall be applicable, not as a BAT requirement, but rather as a voluntary restriction accepted by the permittee.
 - v. Recordkeeping requirements d)(8) and d(9) shall be applicable, not as BAT requirements, but rather as voluntary requirements accepted by the permittee.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation, and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
 - (3) Natural gas shall be the only fuel used to supply heat to the make-up air unit in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number of each coating employed, as applied, and/or the name and identification number of each mixture employed if two or more materials are mixed together before application.

- b. The formula for any mixtures of two or more materials employed, including the name or identification number of the individual components and the mix ratio as applied.
 - c. The VOC content, in pounds per gallon, of each coating employed, as applied, and/or the VOC content, in pounds per gallon, of each mixture employed if two or more materials are mixed together before application.
 - d. The number of gallons of each coating employed, as applied, and/or the number of gallons of each mixture employed if two or more materials are mixed together before application.
 - e. The total number of gallons of all the coatings employed.
 - f. The number of hours the emissions unit was in operation that day.
- (2) The permittee shall collect and record the following information for each month for this emissions unit:
- a. The name and identification number of each cleanup material employed.
 - b. The VOC content of each cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter system, along with documentation of any modifications deemed necessary by the permittee.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals, with any modifications deemed necessary by the permittee. These periodic inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.
- (5) In addition to the periodic inspections described above, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter system while the emissions unit is shut down, and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system, and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of the person who performed the inspection.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter system was not in service when the emissions unit was in operation, as well as a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee.
- (8) For each day during which the permittee burns a fuel other than natural gas in the make-up air unit used to provide heated air to reduce coating drying time in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (9) The permittee shall maintain the record keeping required by terms d)(1) thru d)(8) above at the facility for a period of not less than five years, and these records shall be made available to Ohio EPA upon request.
- (10) The permit-to-install and operate (PTIO) application 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. The "Toxic Air Contaminant Statute," ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the maximum potential operating hours of the emissions unit, i.e., 24 hours per

day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$(TLV/10) \times (8/24) \times (5/7) = (4)(TLV)/(24)(7) = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: MIBK (methyl isobutyl ketone, CAS No. 108101)

TLV (mg/m³): 81.93

Maximum Hourly Emission Rate (lb/hr): 1.15 lb/hr

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 75.61

MAGLC (µg/m³): $1950.7[(4)(81.93)/(24)(7)] = 1.9507 \text{ mg/m}^3 = 1950.7 \text{ µg/m}^3$

The permittee, has demonstrated that emissions of MIBK from emissions unit K004 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute," ORC 3704.03(F).

- (11) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - 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.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change.

The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute," ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal, or they may be mailed as a hard copy to the Canton City Health Department, Air Pollution Control Division.
 - (2) The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing (see (1) above) of any record showing that the dry filtration system was not in service or was not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals when this emissions unit was in operation. The notification shall include a copy of such record and shall be submitted within 30 days after the event occurs.

- (3) The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing (see (1) above) of any daily record showing that the emissions unit employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be submitted within 30 days after the exceedance occurs.
 - (4) The permittee shall submit deviation (excursion) reports to the Canton City Health Department, Air Pollution Control Division (see (1) above) that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (6) The permittee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit, or the exhaust stack have been made, the PER shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) and the Operational Restrictions specified in section c) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 13.65 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

This emissions limitation was established by calculating the maximum potential-to-emit for the following processes combined:

 1. The spray process, based on the coating with the highest VOC content.
 2. Cleanup material usage, based on the material with the highest VOC content.
 3. The natural gas-fired heater (products of combustion).

Spray Process

First, the maximum daily potential-to-emit for the coating spray process was calculated as shown below, based on the operational restriction of 10 gal/day,

the coating material with the highest VOC content as applied. (Material data was provided by the permittee in the permit application.)

$$(10 \text{ gal/day}) \times (6.038 \text{ lb/gal})_{\text{VOC}} = 60.38 \text{ lb}_{\text{VOC}}/\text{day}$$

Next, the maximum annual potential-to-emit was calculated as shown below by multiplying the maximum daily emissions rate by a maximum operating schedule of 365 days/yr, then dividing by 2000 lb/ton.

$$(60.38 \text{ lb}_{\text{VOC}}/\text{day}) \times (365 \text{ days/yr}) \div (2000 \text{ lb/ton}) = 11.02 \text{ ton}_{\text{VOC}}/\text{yr}$$

Cleanup Material Usage

First, the maximum monthly potential-to-emit for cleanup material usage was calculated as shown below, based on the maximum monthly usage of 80 gal and the cleanup material with the highest VOC content. (Maximum monthly usage and material data were provided by the permittee in the permit application.)

$$(80 \text{ gal/month}) \times (5.40 \text{ lb/gal})_{\text{VOC}} = 432.0 \text{ lb}_{\text{VOC}}/\text{month}$$

Next, the maximum annual potential-to-emit was calculated as shown below by multiplying the maximum monthly emissions rate by 12 months/yr, then dividing by 2000 lb/ton.

$$(432.0 \text{ lb}_{\text{VOC}}/\text{month}) \times (12 \text{ months/yr}) \div (2000 \text{ lb/ton}) = 2.59 \text{ ton}_{\text{VOC}}/\text{yr}$$

Natural Gas Combustion

First, maximum natural gas usage was calculated as follows:

$$(1.6524 \times 10^6 \text{ Btu/hr}) \div (1020 \text{ Btu/scf gas}) = 0.00162 \times 10^6 \text{ scf gas/hr}$$

Next, the following emissions factor was applied: 5.5 lb VOC per million scf natural gas burned (AP 42, Fifth Edition, Table 1.4-2).

$$(5.5 \text{ lb}_{\text{VOC}}/10^6 \text{ scf gas}) \times (0.00162 \times 10^6 \text{ scf gas/hr}) = 0.009 \text{ lb}_{\text{VOC}}/\text{hr}$$

As a conservative measure, the maximum annual potential-to-emit for the combustion of natural gas in the heater was calculated by multiplying the maximum hourly emissions rate by a maximum operating schedule of 8760 hr/yr, then dividing by 2000 lb/ton.

$$(0.009 \text{ lb}_{\text{VOC}}/\text{hr}) \times (8760 \text{ hr/yr}) \div (2000 \text{ lb/ton}) = 0.04 \text{ ton}_{\text{VOC}}/\text{yr}$$

Summation

$$11.02 \text{ ton}_{\text{VOC}}/\text{yr}_{\text{SPRAY}} + 2.59 \text{ ton}_{\text{VOC}}/\text{yr}_{\text{CLEANUP}} + 0.04 \text{ ton}_{\text{VOC}}/\text{yr}_{\text{NG COMBUSTION}} = 13.65 \text{ ton}_{\text{VOC}}/\text{yr}$$

Compliance Demonstration:

After the emissions unit has been in operation for a minimum of 12 months, compliance with the rolling, 12-month emission limitation shall be assumed if the recordkeeping specified in d)(1) and d)(2) above demonstrates the following:

1. The maximum VOC content of any coating, as applied, does not exceed 6.038 lb/gal, which was the value provided by the permittee in the permit application for the calculation of maximum potential-to-emit.
2. The total number of gallons of all coatings employed on any day does not exceed 10 gallons.
3. The maximum VOC content of any cleanup material employed does not exceed 5.40 lb/gal, which was the value provided by the permittee in the permit application for the calculation of maximum potential-to-emit.
4. The total number of gallons of all cleanup material employed during any month does not exceed 80 gallons, which was the value provided by the permittee in the permit application for the calculation of maximum potential-to-emit.

As an alternative, and also after the emissions unit has been in operation for a minimum of 12 months, compliance with the rolling, 12-month emission limitation may be demonstrated by utilizing the above calculations for maximum potential-to-emit, but with actual data based upon the record keeping specified in d)(1) and d)(2) above to arrive at a monthly total, then adding the most recent monthly total to the running total for the previous 11 months to arrive at a rolling, 12-month summation.

b. Emission Limitation:

If term b)(1)b. above is applicable (BAT limitation) the following limitation applies:

Filterable particulate emissions (PE)* shall not exceed 0.28 pound per hour as a combined total from the stacks serving this emissions unit.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀).

Applicable Compliance Method:

This emissions limitation was established by calculating the maximum hourly potential-to-emit, with controls, for the following processes combined:

1. The spray process based on the coating with the highest solids content.
2. The natural gas-fired heater (products of combustion).

Spray Process

First, the maximum daily potential-to-emit for the coating spray process (with controls) was calculated as shown below based on the operational restriction of 10 gal/day, the coating material with the highest solids content as applied,

a worst-case transfer efficiency estimate of 55%, and a filter control efficiency of 97%. (Material data, transfer efficiency and control efficiency were provided by the permittee in the permit application.)

$$(10 \text{ gal/day}) \times (9.17 \text{ lb/gal})_{\text{SOLIDS}} \times (1 - 0.55) \times (1 - 0.97) = 1.24 \text{ lb}_{\text{PE}}/\text{day}$$

The maximum hourly potential-to-emit for the coating spray process (with controls) was then calculated as shown below based on permittee's request, as provided in the permit application, that the maximum coating usage rate of 10 gal/day be permitted to occur within one 8-hr shift.

$$(1.24 \text{ lb}_{\text{PE}}/\text{day}) \div (8 \text{ hr/day}) = 0.16 \text{ lb}_{\text{PE}}/\text{hr}$$

Natural Gas Combustion

First, maximum natural gas usage was calculated as follows:

$$(1.6524 \times 10^6 \text{ Btu/hr}) \div (1020 \text{ Btu/scf gas}) = 0.00162 \times 10^6 \text{ scf gas/hr}$$

Next, the following emissions factor was applied: 7.6 lb PE per million scf natural gas burned (AP 42, Fifth Edition, Table 1.4-2).

$$(7.6 \text{ lb}_{\text{PE}}/10^6 \text{ scf gas}) \times (0.00162 \times 10^6 \text{ scf gas/hr}) = 0.012 \text{ lb}_{\text{PE}}/\text{hr}$$

Summation

$$0.16 \text{ lb}_{\text{PE}}/\text{hr}_{\text{SPRAY}} + 0.012 \text{ lb}_{\text{PE}}/\text{hr}_{\text{NG COMBUSTION}} = 0.28 \text{ lb}_{\text{PE}}/\text{hr}$$

Compliance Demonstration:

If required, hourly filterable PE emissions compliance shall be demonstrated utilizing the above calculations for maximum hourly potential-to-emit, but with actual data based upon the record keeping specified in d)(1) above and the product data sheets for the solids content of each material used on a given day.

Also, if required, hourly PE emissions compliance shall be demonstrated based upon emissions testing performed according to Method 5 in Appendix A of 40 CFR Part 60.

c. Emission Limitation:

If term b)(1)b. above is applicable (BAT limitation) the following limitations apply:

Filterable particulate emissions (PE)* shall not exceed 0.3 tons per year as a combined total from the stacks serving this emissions unit.

* For the purposes of this permit, all particulate emissions (PE) are assumed to be particulate matter less than 10 microns in diameter (PM₁₀).

Applicable Compliance Method:

This emissions limitation was established by calculating the maximum annual potential-to-emit, with controls, for the following processes combined:

1. The spray process, based on the coating with the highest solids content.
2. The natural gas-fired heater (products of combustion).

Spray Process

First, the maximum daily potential-to-emit for the coating spray process (with controls) was calculated in f)(1)b. above as 1.24 lb_{PE}/day.

The maximum annual potential-to-emit for the coating spray process (with controls) was then calculated as shown below by multiplying the maximum daily emissions rate by a maximum operating schedule of 365 days/yr, then dividing by 2000 lb/ton.

$$(1.24 \text{ lb}_{PE}/\text{day}) \times (365 \text{ days}/\text{yr}) \div (2000 \text{ lb}/\text{ton}) = 0.23 \text{ ton}_{PE}/\text{yr}$$

Natural Gas Combustion

As a conservative measure, the maximum annual potential-to-emit for the combustion of natural gas in the heater was calculated by multiplying the maximum hourly emissions rate as calculated in f)(1)a. above by a maximum operating schedule of 8760 hr/yr, then dividing by 2000 lb/ton.

$$(0.012 \text{ lb}_{PE}/\text{hr}) \times (8760 \text{ hr}/\text{yr}) \div (2000 \text{ lb}/\text{ton}) = 0.05 \text{ ton}_{PE}/\text{yr}$$

Summation

$$0.23 \text{ ton}_{PE}/\text{yr}_{\text{SPRAY}} + 0.05 \text{ ton}_{PE}/\text{yr}_{\text{NG COMBUSTION}} = 0.28 \text{ ton}_{PE}/\text{yr}, \text{ rounded up to } 0.3 \text{ ton}_{PE}/\text{yr}$$

Compliance Demonstration:

If required, compliance shall be demonstrated utilizing the above calculations for maximum potential-to-emit, but with actual data based upon the record keeping specified in d)(1) above and the product data sheets for the solids content of each material used on a given day, then summing the results for all days during a given year.

d. Emission Limitation:

If term b)(1)b. above is applicable (BAT limitation) the following limitations apply:

Nitrogen oxides (NO_x) emissions shall not exceed 0.15 lb/hr and 0.67 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by calculating the maximum potential-to-emit based upon the maximum heat input capacity of the heater (1.6524 mmBtu/hr). First, maximum natural gas usage was calculated as follows:

$$(1.6524 \times 10^6 \text{ Btu/hr}) \div (1020 \text{ Btu/scf gas}) = 0.00162 \times 10^6 \text{ scf gas/hr}$$

Next, the following emissions factor was applied: 94 lb_{NO_x} per million scf natural gas burned (AP 42, Fifth Edition, Table 1.4-1: residential furnace).

$$(94 \text{ lb}_{\text{NO}_x} / 10^6 \text{ scf gas}) \times (0.00162 \times 10^6 \text{ scf gas/hr}) = 0.15 \text{ lb}_{\text{NO}_x} / \text{hr}$$

If required, compliance with the hourly limitation for nitrogen oxides shall be demonstrated based upon emission testing performed according to Method 7 of 40 CFR Part 60, Appendix A.

The annual emissions limitation was established by multiplying the maximum hourly limit by 8760 hr/yr, then dividing by 2000 lb/ton:

$$(0.15 \text{ lb}_{\text{NO}_x} / \text{hr}) \times (8760 \text{ hr/yr}) \div (2000 \text{ lb/ton}) = 0.67 \text{ ton}_{\text{NO}_x} / \text{yr}$$

Compliance with the annual limitation can only be demonstrated by first requiring a demonstration of compliance with the hourly limitation, at which point compliance with the annual limitation shall also be assumed.

e. Emission Limitation:

If term b)(1)b. above is applicable (BAT limitation) the following limitations apply:

Carbon monoxide (CO) emissions shall not exceed 0.07 lb/hr and 0.31 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by calculating the maximum potential-to-emit based upon the maximum heat input capacity of the heater (1.6524 mmBtu/hr). First, maximum natural gas usage was calculated as follows:

$$(1.6524 \times 10^6 \text{ Btu/hr}) \div (1020 \text{ Btu/scf gas}) = 0.00162 \times 10^6 \text{ scf gas/hr}$$

Next, the following emissions factor was applied: 40 lb_{CO} per million scf natural gas burned (AP 42, Fifth Edition, Table 1.4-1: residential furnace).

$$(40 \text{ lb}_{\text{CO}} / 10^6 \text{ scf gas}) \times (0.00162 \times 10^6 \text{ scf gas/hr}) = 0.065 \approx 0.07 \text{ lb}_{\text{CO}} / \text{hr}$$

If required, compliance with the hourly limitation for carbon monoxide shall be demonstrated based upon emission testing performed according to Method 10 of 40 CFR Part 60, Appendix A.

The annual emissions limit was established by multiplying the maximum hourly limit by 8760 hr/yr, then dividing by 2000 lb/ton:

$$(0.07 \text{ lb}_{\text{CO}}/\text{hr}) \times (8760 \text{ hr/yr}) \div (2000 \text{ lb/ton}) = 0.31 \text{ ton}_{\text{CO}}/\text{yr}$$

Compliance with the annual limitation can only be demonstrated by first requiring a demonstration of compliance with the hourly limitation, at which point compliance with the annual limitation shall also be assumed.

f. Operational Restriction:

Total coating usage shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)e. above.

g. Emission Limitation – for informational purposes only:

OAC rule 3745-17-10(B) concerns restrictions on particulate emissions from fuel burning equipment. The particulate emission limitation specified in paragraph (B)(1) of this rule is 0.326 lb/hr, which is less stringent than the uncontrolled potential-to-emit of 0.012 lb/hr for the natural gas fuel burning equipment in this emissions unit, calculated as follows:

The maximum heat input for the make-up air unit used to provide heated air to reduce coating drying time in this emissions unit is 1.6524 mmBtu/hr. The maximum natural gas usage rate is calculated as follows:

$$(1.6524 \text{ mmBtu/hr}) \div (1020 \text{ Btu/scf}_{\text{GAS}}) = 0.00162 \times 10^6 \text{ scf}_{\text{GAS}}/\text{hr}$$

The Emission Factor for total particulate matter from natural gas combustion is 7.6 lb per 10⁶scf (Reference: U.S. EPA, AP-42 Table 1.4-2.) So the potential-to-emit is calculated as follows:

$$(0.00162 \times 10^6 \text{ scf}_{\text{GAS}}/\text{hr}) \times (7.6 \text{ lb}_{\text{PE}}/10^6 \text{ scf}_{\text{GAS}}) = 0.012 \text{ lb}_{\text{PE}}/\text{hr}$$

g) Miscellaneous Requirements

(1) None.