



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
WOOD COUNTY
Application No: 03-10454

DATE: 7/20/2004

Cooper Engineered Products
Heather Beery
1175 N Main St
Bowling Green, OH 43402

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely

A handwritten signature in cursive script that reads "Michael W. Ahern".

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 7/20/2004
Effective Date: 7/20/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-10454

Application Number: **03-10454**
APS Premise Number: **0387020045**
Permit Fee: **\$0**
Name of Facility: **Cooper Engineered Products Beery**
Person to Contact: **Heather**
Address: **1175 N Main St
Bowling Green, OH 43402**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1175 N. Main St.
Bowling Green, OHIO**

Description of modification:
Administrative Modification of PTI 03-10454 - to remove some previous BAT artifacts no longer applicable, to remove an emissions unit now under a different PTI, and some misc. corrections.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

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PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Cooper Engineered Products** located in **WOOD** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Conveyor

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
R029 (new)	Flock Line #4 - Adhesive Booth, Drying Conveyor, and Flocking Booth (Administrative Modification of PTI 03-10454 Issued on 7/16/97 and modified on 9/10/98)

P044
(new)

Flock Line #4 -Coating
Cure Oven #1 and Cooling

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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BAT Determination

Use of only nonphoto-chemically reactive cleanup materials and compliance with the emissions limits and terms and conditions of this permit.

Compliance with the emissions limits and terms and conditions of this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Applicable Federal & OAC Rules	3745-31-05	Permit Allowable Mass Emissions and/or Control/Usage Requirements	photochemically reactive materials as defined in OAC rule 3745-21-01 (C) (5)
	3745-31-05 3745-21-07 (G) (9) (g)		The combined OC emissions from R029 and P044 shall not exceed 77.1 lbs OC/day, excluding cleanup material emissions.	The total OC emissions from R029 and P044 shall not exceed 7.3 tons/yr, based upon a rolling 12-month summation, excluding cleanup material emissions.
	3745-31-05 3745-17-11 3745-17-07	3745-31-05 3745-21-07 (G) (9) (g)	The PM emissions from the flocking booth shall not exceed 0.1 lb/hr, 0.44 ton/yr, and twenty percent opacity as a six-minute average, except as provided by rule.	See Additional Special Terms and Conditions. The combined OC emissions from R029 and P044 shall not exceed 77.1 lbs OC/day, excluding cleanup material emissions.
	3745-31-05	3745-31-05	The OC emissions resulting from cleanup materials employed in R029 shall not exceed 169 lbs OC/month and 0.85 ton OC/yr, based upon a rolling 12-month summation. The cleanup materials shall not be	The Total OC emissions from R027 and P044 shall not exceed 7.3 tons/yr, based upon a rolling 12-month summation, excluding cleanup material emissions.

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds (OC)	8.15
Particulate Matter (PM)	0.44

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CONSTRUCTION STATUS

The **NWDO** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **Flock Line Number 4.**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule

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3745-15-07.

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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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

Copper Engineered Products (hereinafter referred to as "permittee") submitted a permit to install application for a new Flock Line # 4 at the Bowling Green facility located at 1175 North Main. This permit to install (PTI Number 03-0454) will allow for the installation of Extruders, Super Jet Oven, Oven # 1, Tear Strip, Cooling Trough, Surface Treat, Adhesive Booth, Drying Conveyor, Flocking Booth, Oven #2, Cooling Conveyor and Cutter.

A. Applicable Emission Limitations and/or Control Requirements

1. This permit allows the use of the coatings, cleanup materials and rubber compound material specified by the permittee in the application for PTI number 03-0454. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the xylene, MEK, and carbon disulfide organic compound emission limitation (s) specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on the following coating and cleanup material formulation data, an emission factor of 6.43×10^{-4} lb of carbon disulfide/lb of rubber cured from a Rubber Manufacturers Association manual entitled Emissions Factors Development Project, dated September 1996, and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model, Version 95250 and a comparison of the predicated 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Organic Compounds

Pollutant: Xylene (Stack #194-R029)

TLV (ug/m3): 434.000

Maximum Hourly Emission Rate (lbs/hr): 3.3

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Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
353.3

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 10,333

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Pollutant: MEK (Stack #194-R027)

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.04

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
325.5

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 14,048

Pollutant: Carbon Disulfide (Stack #195-P044)

TLV (ug/m3): 31,000

Maximum Hourly Emission Rate (lbs/hr): 0.51

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3):
39.8

Maximum Acceptable Ground-level Concentration (MAGLC) (ug/m3): 738.1

Any of the following changes may be deemed a modification to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modification to PTI number 03-0454 and the operating permit:

- a. Any changes in the composition of the coating, cleanup or rubber compound materials, or the use of new coating, cleanup or rubber compound materials, as specified by the permittee in the application for PTI no. 03-0454, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH), " than the TLV values specified in the above table;
- b. Any change to the emission unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC s specified in the above table;
- c. A reduction in the TLV by the ACGIH for any of the coating and cleanup materials

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and compounds emitted during rubber curing, as specified by the permittee in the application for PTI no. 03-0454 that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLCs;

- d. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation (s) established by this permit or would otherwise be considered a permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,

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- e. Any change in the composition of the coating, cleanup or rubber compound materials, or use of new coatings or cleanup or rubber compound materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) are defined in OAC rule 3745-77-01 (V).

2. The OC emissions from emissions units R0029 and P044 are generated from the application of coating (adhesive) and cleanup materials. Emissions from rubber curing are based on the emission factor of 8.25×10^{-4} pounds of VOC/lb of rubber cured, which was obtained from the Rubber Manufacturers Association "Emission Factors Development Project" Manual, Dated September, 1996. All OC emissions from rubber curing are assumed to be emitted from emissions unit P049.

B. Operational Restrictions

1. The combined emissions of organic compounds from emissions units R029 and P044 shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emission of Organic Compounds (Tons)</u>
1	1.8
1-2	2.3
1-3	2.8
1-4	3.3
1-5	3.8
1-6	4.3
1-7	4.8
1-8	5.3
1-9	5.8
1-10	6.3
1-11	6.8
1-12	7.3

After the first 12 calendar months of operation following the issuance of this permit,

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compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

2. The cleanup emissions of organic compounds from emission unit R029 shall not exceed 0.85 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emission of Organic Compounds (Tons)</u>
1	0.21
1-2	0.27
1-3	0.33
1-4	0.39
1-5	0.45
1-6	0.51
1-7	0.57
1-8	0.63
1-9	0.69
1-10	0.75
1-11	0.81
1-12	0.85

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each week for emission units R029 and P044:
 - a. The company identification for each coating employed;
 - b. The number of gallons of each coating employed;

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- c. The organic compound content of each coating, in pounds per gallon;
- d. The volatile organic compound content of each coating, excluding water and exempt solvents, in pounds per gallon;
- e. The organic compound emission rate for each coating (assuming all solvent in the coating is emitted), in pounds per week;
- f. The total organic compound emission rate for all coatings, in pounds per week;
- g. The total number of days the emissions units were in operation; and,
- h. The average daily organic compound emission rate, calculated by dividing the weekly emissions by the number of days the emissions units were in operation, i.e., (f)/(g) from above, in pounds per day (average).

[Note: The coating information must be for the coating as employed, including any thinning solvents added at the emission unit.

2. The permittee shall collect and record the following each month for emissions units R027 and P044:
 - a. The total OC emissions for the month, in tons;
 - b. During the first 12 calendar months of operation under this permit, the total cumulative monthly OC emissions (per term and condition B.2); and,
 - c. Beginning after the first 12 calendar months of operation under this permit, the total amount of OC emitted per rolling, 12-month period (per term and condition B.2).
3. The permittee shall collect and record the following each month for emissions unit R029:
 - a. The total OC emissions for the month from cleanup materials, in pounds;
 - b. During the first 12 calendar months of operation under this permit, the total cumulative monthly cleanup OC emissions (per term and condition B.3); and,
 - c. Beginning after the first 12 calendar months of operation under this permit, the total amount of cleanup OC emitted per rolling, 12-month period (per term and condition B.3).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R029 and P044 which include the following information:
 - a. An identification of each week during which the average daily organic compound emissions from emissions units R029 and P044 exceeded 77.1 pounds per day, and the actual average daily organic compound emissions for each such day;
 - b. An identification of all exceedance of the rolling, 12-month emission limitation for organic compounds from emissions units R029 and P044 and, for the first 12 calendar months or operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - c. An identification of all exceedances of the rolling' 12-month cleanup emission limitation for organic compound emissions from emissions unit R029 and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup emission levels; and'
 - d. An identification of all exceedances of the VOC content limitation of 3.6 pounds per gallon' excluding water and exempt solvents.
2. Except as otherwise may be provided in the terms and conditions for a specified emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).
3. The permittee shall submit annual reports (emission fee reports) summarizing the total OC emissions from emissions units R0029 & P044, and the total OC cleanup emissions from emissions unit R029. These reports shall be submitted by April 15 of each year and shall address the previous calendar year.

E. Compliance Methods/Testing Requirements

1. OC and VOC Content

U.S. EPA Method 24 shall be used to determine the OC and VOC content of the adhesives.

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If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

2. Visible Emissions

Visible emissions readings shall be performed using Method 9 of 40 CFR Part 60, Appendix A.

3. Mass Emissions and Production

- a. Compliance with the OC emission limitation of 77.1 lbs OC/day shall be determined by the recordkeeping requirements in C.1.
- b. Compliance with the monthly and annual OC emission limitations for cleanup materials shall be determined by the recordkeeping requirements in C.3.
- c. Compliance with the OC emission limitation of 7.3 tons/year shall be determined by the recordkeeping requirements in C.1 and C.2.

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d. If required, an emission test shall be performed in accordance with OAC rule 3745-17-03 (B)(10) to demonstrate compliance with the allowable hourly particulate emission rate of 0.1 pound per hour.

e. Compliance with the annual particulate emission limit of the 0.44 ton per year shall be determined by multiplying the allowable PM emission rate of 0.1 pound per hour by the actual hours of operation during the calendar year, and dividing by 2000.

F. Miscellaneous Requirements

None