

Facility ID: 0546000103 Issuance type: Final State Permit To Operate

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

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

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

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[Go to Part II for Emissions Unit R025](#)

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Facility ID: 0546000103 Emissions Unit ID: R024 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(R024) - PVC TP-8 Encapsulation Line	OAC rule 3745-31-05(A)(3) PTI 05-14175 and PTI 05-14377	The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.41 lbs/hr. The total OC emissions from the coatings employed in this emission unit shall not exceed 1.80 tons per year. The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.
	OAC rule 3745-35-07(B)(2) Synthetic Minor to avoid Title V OAC Rule 3745-21-07(G)(2)	Ohio Toxic Policy See Section A.2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The hourly and annual emissions limitations for OC have been established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the limitations, except on days when photochemically reactive materials are used.
 The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

 * This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation, when employing photochemically reactive materials:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;

- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
- 3. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
 - a. the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - b. the name and identification number of each HAP containing material employed;
 - c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - d. The amount of each HAP containing material employed, in gallons;
 - e. the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - f. the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];
 - g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

- 4. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 3.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 122.1

MAGLC (ug/m3): 4485.8

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, 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 lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - 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 "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
- The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which include the following information:
- an identification of each 12-month period during which the OC emissions from the coatings employed in this emission unit exceeded 1.80 tons;
 - an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
 - an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
 - an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.
3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
- Emission Limitation:
- 0.41pounds per hour OC, from coatings employed.
- Applicable Compliance Method:
- The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:
- $$E_h = C_u * OC_c$$
- where:
- E_h = emission rate (lbs/hr);

Cu= Maximum coating usage (0.059 gallons per hour); and

OCc= Maximum OC content (6.94 lbs/gal)

Emission Limitation:

1.80 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$AER = (Eh * 8760)/2000$$

where:

AER = Annual emission rate, (tons/yr); and

Eh = Hourly emission rate (lbs/hr).

Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emissions units K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.

Applicable Compliance Method:

Compliance with the annual combined cleanup allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in Section A.I.C.2 of this permit.

- 2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

- 1. 1.The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., D. and E.

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Facility ID: 0546000103 Emissions Unit ID: R025 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.
- 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.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(R025) - PVC TP-5 Encapsulation Line	OAC rule 3745-31-05(A)(3) PTI 05-14175 and PTI 05-14377	The Organic Compound (OC) emissions from the coating materials employed shall not exceed shall not exceed 0.41 lbs/hr. The total OC emissions from the coatings employed in this emission unit shall not exceed 1.80 tons per year. The combined overall OC emissions from the use of cleanup materials in emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.

OAC rule 3745-35-07(B)(2)
 Synthetic Minor to avoid Title V
 OAC Rule 3745-21-07(G)(2)

Ohio Toxic Policy
 See Section A.2.b

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- (a) The hourly and annual emissions limitations for OC have been established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with the limitations, except on days when photochemically reactive materials are used.
 The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emission units at this facility K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each day for the coating operation, when employing photochemically reactive materials:
- the company identification for each coating and photochemically reactive cleanup material employed;
 - the number of gallons of each coating and photochemically reactive cleanup material employed;
 - the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]
2. The permittee shall collect and record the following information each month on the cleanup materials in emission units: K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- the name of the material employed;
 - the amount of material employed, in gallons;
 - the organic compound content, in lbs/gallon;
 - the OC emission of all cleanup materials, in tons per month; and
 - the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
3. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emission units: K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025:
- the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
 - the name and identification number of each HAP containing material employed;
 - the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;
 - The amount of each HAP containing material employed, in gallons;
 - the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
 - the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating];

g. the updated rolling, 12-month summation of usage for each individual HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

h. the updated rolling, 12-month summation of usage for total combined HAP**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporate.

4. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,405

Maximum Hourly Emission Rate (lbs/hr): 3.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 122.1

MAGLC (ug/m3): 4485.8

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, 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 lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each 12-month period during which the OC emissions from the coatings employed in this

emission unit exceeded 1.80 tons;

- b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;
- c. an identification of each month during which the individual HAP emissions at the facility exceeded 9.0 tons per year, based on a 12-month rolling average; and
- d. an identification of each month during which the combined HAP emissions at the facility exceeded 24.0 tons per year, based on a 12-month rolling average.

- 3. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

0.41pounds per hour OC, from coatings employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$Eh = Cu * OCc$$

where:

Eh = emission rate (lbs/hr);

Cu= Maximum coating usage (0.059 gallons per hour); and

OCc= Maximum OC content (6.94 lbs/gal)

Emission Limitation:

1.80 tons of OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based shall be determined based on the following equation:

$$AER = (Eh * 8760)/2000$$

where:

AER = Annual emission rate, (tons/yr); and

Eh = Hourly emission rate (lbs/hr).

Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emissions units K006, K009, R001, R004, R005, R007, R008, R009, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, and R025, shall not exceed 13.00 tons per 12 month period.

Applicable Compliance Method:

Compliance with the annual combined cleanup allowable OC emission limitation above shall be demonstrated through the record keeping requirements established in Section A.I.C.2 of this permit.

- 2. Compliance with the HAP(s) emissions limitations in term A.2.b shall be determined by the record keeping in Section C.4.g. and h. of these T&C's.

F. Miscellaneous Requirements

- 1. 1.The following terms and conditions are federally enforceable: A., B., C.1., 2., 3., D. and E.