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Facility Name: **Johns-Manville International Inc**

Application Number: **03-0821**

Date: **May 28, 1998**

**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 SOURCE(S)

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 Ohio 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

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(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 prove to be inadequate or 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 15 days of the effective date of this permit to install.

#### 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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; 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 **Johns-Manville International Inc** located in **Defiance** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
K001 (Mod)	Maintenance paint room

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

Compliance  
with the terms  
and  
conditions of  
this permit  
and the Air  
Toxics Policy

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
			<u>Applicable Federal &amp; OAC Rules</u>	
	3745-31-05			Coating usage not to exceed 10
	3745-21-09			gallons/day, 51.9
	(U) (2) (e)			pounds OC/day, 9.47
	3745-21-07			TPY OC*, 8 pounds
	(G) (2)			OC/hour and 40
				pounds OC/day when
				employing
				photochemically
				reactive coatings,
				7.3 TPY OC (See
				Additional Special
				Terms and
				Conditions)
				154.41 pounds
				OC/month and 0.93
				TPY OC from clean up
				operations;
				0.551 pound PM/hour,
				2.41 TPY PM
	3745-17-11			0 percent opacity,
	(B)			as a 6 minute
				average
	3745-17-07			
	(A)			

SUMMARY

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TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	10.40*
PM	2.41

\* This represents an increase of 0.93 TPY over the limit previously established in PTI 03-5463.

Note: PM emissions were not established in the previous PTI.

**REPORTING REQUIREMENTS**

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

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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 **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 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 3745-15-07.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **Introduction**

This is a modification of emissions unit (EU) K001 (MAINTENANCE PAINT ROOM) that will allow the company to paint more than just metal parts in this EU. Metal parts will still be the vast majority of all parts painted (approximately 90 percent). This PTI supersedes the requirements of PTI No. 03-5463.

##### **A. Applicable Emission Limitations and/or Control Requirements**

1. The permittee shall operate EU K001 in a manner that will not result in an exceedance of the following emissions limitations:
  - a. on each day in which only miscellaneous metal parts are painted, OC emissions from the application of coatings shall not exceed 51.9 pounds/day;
  - b. on each day in which only nonmetal parts are painted, and all the coatings applied are non photochemically reactive materials, OC emissions from the application of coatings shall not exceed 51.9 pounds/day;

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- c. on each day in which both miscellaneous metal parts and nonmetal parts are painted, and all the coatings applied to the nonmetal parts are non photochemically reactive materials, the combined OC emissions from the application of coatings to both miscellaneous metal parts and nonmetal parts shall not exceed 51.9 pounds/day;
- d. on each day in which only non metal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01, OC emissions from the application of coatings shall not exceed 8.0 pounds/hr (average) and 40 pounds/day;
- e. on each day in which both miscellaneous metal parts and nonmetal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01, OC emissions from only the application of coatings to non metal parts shall not exceed 8.0 pounds/hr (average) and 40 pounds/day. OC emissions from only the application of coatings to miscellaneous metal parts shall not exceed 51.9 pounds/day;
- f. OC emissions from the application of coatings to both miscellaneous metal parts and nonmetal parts shall not exceed 9.47 tons/year;
- g. OC emissions from clean up material usage shall not exceed 154.41 pounds/month;
- h. PM emissions shall not exceed 0.550 pound/hour; and,
- i. visible PM emissions shall not exceed 0 percent opacity, as a six-minute average.

#### **B. Operational Restrictions**

- 1. This permit allows for the use of the coatings and cleanup materials specified by the permittee in PTI

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number 03-0821. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the binders and catalyst material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the results from Screen 3 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

Ohio EPA Emissions Unit #	Pollutant	TLV ( $\mu\text{g}/\text{m}^3$ )	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line ( $\mu\text{g}/\text{m}^3$ )	Maximum Acceptable Ground-Level Concentration (MAGLC) ( $\mu\text{g}/\text{m}^3$ )
K001	Toluene*	188,000	1.63	1795	4476

\* Toluene has the highest hourly emissions rate for all HAP's and the lowest TLV. Since it passes air toxics review, it can be assumed that all HAP's would pass air toxics review.

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:

- a. any change in the composition of the coatings and cleanup materials, or the use of new coatings and cleanup 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 specified in the above table. For emissions unit K001 this would include reformulations and/or use of new coatings that result in the emissions of compounds in excess of 1.0 TPY which do have TLVs

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established in ACGIH;

- b. any change to the emissions 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 specified in the above table; and,
  - c. 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 "modification" as defined in OAC rule 3745-31-01.
2. The permittee shall not employ cleanup materials in emissions unit K001 that are considered "photochemically reactive materials", as defined in OAC 3745-21-01.
  3. Coating usage in EU K001 shall not exceed 10 gallons/day.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on each day in which only miscellaneous metal parts are painted in EU K001:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed; and,
  - d. the total OC emissions from all coatings employed, in pounds per day.
2. The permittee shall collect and record the following information on each day in which only nonmetal parts are painted, and all the coatings applied to the nonmetal parts are non photochemically reactive materials in EU K001

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- a. the name and identification number of each coating employed;
  - b. documentation on whether or not each coating is a photochemically reactive material;
  - c. the volume, in gallons, of each coating employed;
  - d. the total volume, in gallons, of all of the coatings employed; and,
  - e. the total OC emissions from all coatings employed, in pounds per day.
3. The permittee shall collect and record the following information on each day in which only nonmetal parts are painted in EU K001 and all, or a portion, of the coatings employed are photochemically reactive materials:
- a. the company identification for each coating employed;
  - b. documentation on whether or not each coating is a photochemically reactive material;
  - c. the number of gallons of each coating employed;
  - d. the OC content of each coating in pounds per gallon;
  - e. the OC emission rate for each coating in pounds per day [(c) x (d)];
  - f. the total OC emission rate for all coatings in pounds per day [ $\sum$  (e)];
  - g. the number of hours the emissions unit was in operation; and,
  - h. the average hourly OC emission rate for all coatings, in pounds per hour [(f) ÷ (g)].
4. The permittee shall collect and record the following

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information on each day in which both miscellaneous metal parts and nonmetal parts are painted, and all the coatings applied to the nonmetal parts are non photochemically reactive materials:

- a. the name and identification number of each coating employed;
  - b. documentation on whether or not each coating is a photochemically reactive material;
  - c. the volume, in gallons, of each coating employed;
  - d. the total volume, in gallons, of all of the coatings employed; and,
  - e. the total OC emissions from all coatings employed, in pounds per day.
5. The permittee shall collect and record the following information on each day in which both miscellaneous metal parts and nonmetal parts are painted in EU K001, and all, or a portion, of the coatings employed to the nonmetal parts are photochemically reactive materials:

**For coatings applied to miscellaneous metal parts**

- a. the name and identification number of each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the total volume, in gallons, of all of the coatings employed; and,
- d. the total OC emissions from all coatings employed, in pounds per day.

**For coatings applied to nonmetal parts**

- e. the company identification for each coating employed;
- f. documentation on whether or not each coating is a

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photochemically reactive material;

- g. the number of gallons of each coating employed;
- h. the OC content of each coating in pounds per gallon;
- i. the OC emission rate for each coating in pounds per day [(g) x (h)];
- j. the total OC emission rate for all coatings in pounds per day [ $\sum i$ ];
- k. the number of hours the permittee applied coatings to nonmetal parts; and,
- l. the average hourly OC emission rate for all coatings, in pounds per hour [(j) ÷ (k)].

**For coatings applied to both miscellaneous metal and nonmetal parts**

- m. the total volume, in gallons, of all of the coatings employed.

[Note: For conditions C.1. through 5. above, the coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 6. The permittee shall collect and record the following information each month for cleanup material usage in EU K001:
  - a. the name and identification of each cleanup material employed;
  - b. documentation that each cleanup material is not a photochemically reactive material;
  - c. the number of gallons of each cleanup material employed;
  - d. the OC content of each cleanup material, in pounds per gallon;

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- e. the OC emission rate from each cleanup material, in pounds per month [(c) x (d)]; and,
- f. the total OC emission rate from all cleanup materials employed, in pounds per month [ $\sum$  (e)].

Note: The permittee may also calculate the monthly OC emissions rate in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

Monthly OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density) - (total gallons cleanup material sent off-site for disposal or reclamation, minus the solids content of said material) x the solvent density.

- 7. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:
  - a. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons.
- 8. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

#### **D. Reporting Requirements**

- 1. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit as found in section B.3. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45

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days after the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the organic compound emissions from coatings exceed 51.9 pounds, and the actual organic compound emissions for that day when only nonmetal parts are painted, and all the coatings applied are non photochemically reactive materials.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the organic compound emissions from coatings exceed 51.9 pounds, and the actual organic compound emissions for that day when both miscellaneous metal parts and nonmetal parts are painted, and all the coatings applied to the nonmetal parts are non photochemically reactive materials.
4. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each hour during which the organic compound emissions from coatings exceed 8 pounds per hour, and the actual organic compound emissions for that hour when only non metal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01; and,
  - b. an identification of each day during which the organic compound emissions from coatings exceed 40 pounds, and the actual organic compound emissions for each such day when only non metal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01.
5. The permittee shall submit deviation (excursion) reports on each day when both miscellaneous metal parts

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and nonmetal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01, OC emissions from the application of coatings to non metal parts which include the following information:

**For coatings applied to miscellaneous metal parts**

- a. An identification of each day during which the organic compound emissions from coatings exceed 51.9 pounds, and the actual organic compound emissions for each such day when only nonmetal parts are painted, and all the coatings applied are non photochemically reactive materials.

**For coatings applied to nonmetal parts**

- b. An identification of each hour during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour when only non metal parts are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01.

**For coatings applied to both miscellaneous metal and nonmetal parts**

- c. An identification of each day during which the organic compound emissions from coatings exceed 8 pounds/hour (average) and 40 pounds per day, and the actual organic compound emissions for that day from the non metal portion of the parts that are painted, and one or more of the coatings used on the non metal parts is a "photochemically reactive material" as defined in OAC rule 3745-21-01.
- d. An identification of each day during which the organic compound emissions from coatings exceed 51.9 pounds/hour, and the actual organic compound emissions for that day from the metal portion of the parts that are painted.

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6. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each month during which the organic compound emissions from cleanup materials exceed 154.41 pounds, and the actual organic compound emissions for that month.
7. The permittee shall submit required reports in the following manner: Except as provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA, Northwest District Office. 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.)
8. The compliance status of the emissions unit shall be reported pursuant to the annual certification required by OAC rule 3745-77-07(C) (5).
9. The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

**E. Testing Requirements/Compliance Methods Requirements**

1. Compliance with the emission limitation(s) found in the "Air Emissions Summary" of this permit shall be determined in accordance with the following method(s):

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- a. Emission limitations for OC from coating usage as specified in Section A. of these Additional Special Terms and Conditions

51.90 pounds OC/day, 8.0 pounds OC/hour and 40.0 day, and 9.47 TPY

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C. of these Additional Special Terms and Conditions.

- b. Emission Limitation for cleanup material usage

154.41 pounds OC/month and 0.75 TPY

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C. of these Additional Special Terms and Conditions.

- c. Emission Limitation for PM from coating usage

0.551 pound PM/hour and 2.41 TPY

Applicable Compliance Method

Compliance with the PM emissions shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10). In the absence of Ohio EPA requiring such testing, the permittee may calculate actual PM emission rates for the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{Particulate matter emissions rate (lbs/hr).}$$

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TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

d. Emission Limitation for visible emissions of PM

0 percent opacity, as a six minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B) (1)

**F. Miscellaneous Requirements**

1. None.