

Facility ID: 0204030456 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

- Hadlock Plastics Corporation, facility ID 02 04 03 0272, and Hadlock Plastics Corporation Plant 3, facility ID 02 04 03 0456, are one facility for permitting purposes.
- The following emissions units located at this facility are subject to 40 CFR Part 63, Subpart WWWW-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production:
  - P101 - resin transfer molding; and
  - R101 - tooling and gelcoat booth.

[Authority for term: 40 CFR 63.5800, Table 2 of 40 CFR Part 63, Subpart WWWW and OAC rule 3745-31-05 (A)(3)]
- Incorporation of 40 CFR Part 63, Subpart WWWW as an Attachment to the Permit.

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or record keeping requirements specified in 40 CFR Part 63, Subpart WWWW in accordance with 40 CFR Part 63, Subpart WWWW (including Table(s) and Appendix(ices) referenced in Subpart WWWW which are included in the text of Attachment 1, and are hereby incorporated into this permit as if fully written.

Ordinarily, these requirements would be incorporated into Part III of this permit; however, incorporating Subpart WWWW into Part III of this permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

- 40 CFR Part 63, Subpart A - General Provisions Applicability to 40 CFR Part 63, Subpart WWWW
  - The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 15 of 40 CFR Part 63, Subpart WWWW:
  - Parts 63.1 (a)(1)-(4), 63.1(a)(6), 63.1 (a)(10)-(14), 63.1(b)(1), 63.1 (b)(3), 63.1 (c)(1) and (2), 63.1 (c)(5), 63.1 (e), 63.2, 63.3, 63.4, 63.5 (a)(1) and (2), 63.5(b)(1), 63.5(b)(3) and (4), 63.5 (b)(6), 63.5 (d)(1) and (2), 63.5 (d)(4), 63.5 (e)(1) - (5), 63.5 (f)(1) and (2), 63.6 (a)(1) and (2), 63.6 (b)(1)-(5), 63.6 (b)(7), 63.6 (c)(1) and (2), 63.6 (c)(5), 63.6 (e)(1) - (3), 63.6 (f)(2) and (3), 63.6 (g)(1) - (3), 63.6 (i)(1)-(14), 63.6 (i)(16), 63.6 (j), 63.7 (a) (1), 63.7 (a)(3), 63.7 (b)(1) and (2), 63.7 (c), 63.7 (d), 63.7 (e), 63.7 (f), 63.7 (g), 63.7 (h), 63.8 (a)(1) and (2), 63.8 (a)(4), 63.8 (b)(1) - (3), 63.8 (c)(1) - (4), 63.8 (c)(6) - (8), 63.8 (d), 63.8 (e)(1) - (4), 63.8 (e)(5)(i), 63.8 (f) (1) - (6), 63.8 (g)(1) - (5), 63.9 (a)(1)-(4), 63.9 (b)(1) and (2), 63.9 (b)(4)(i), 63.9 (b)(4)(v), 63.9 (b)(5), 63.9(c), 63.9 (d), 63.9 (e), 63.9 (g)(1), 63.9 (g)(3), 63.9 (h)(1) - (3), 63.9 (h)(5) and (6), 63.9 (i), 63.9(j), 63.10 (a), 63.10 (b)(1), 63.10 (b)(2)(i) - (xiv), 63.10 (b)(3), 63.10 (c)(1), 63.10 (c)(5) - (8), 63.10 (c)(10) - (15), 63.10 (d) (1) and (2), 63.10 (d)(4) and (5), 63.10 (e)(1) - (3), 63.10 (f), 63.11, 63.12, 63.13, 63.14, and 63.15.

The following emissions units are subject to the aforementioned requirements: P101 and R101.

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### b State Only Enforceable Section

- None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0204030456 Emissions Unit ID: P101 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. 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>
P101 is a resin transfer molding (RTM) operation.  [Note: RTM means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.]	OAC rule 3745-31-05(A)(3) (PTI 02-20534)	Organic compounds (OC) emissions shall not exceed 8 lbs per hour, 40 lbs per day and 7.3 tons per year from the RTM operation.  OC emissions shall not exceed 667 lbs per month and 4.0 tons per year from cleanup.  See section A.II.1 below.
	40 CFR Part 63, Subpart WWWW	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart WWWW.  See Part II, sections A.2 and A.3 and Attachment 1 for the applicable requirements of this rule.
	40 CFR Part 63, Subpart A	Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.  See Part II, section A.4 and Attachment 1 for the applicable requirements of this rule.  Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The only organic material employed for cleanup shall be acetone.  
 [Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20534]

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

1. The permittee shall collect the following records each day from the RTM process:
  - a. the identification of each organic material employed;
  - b. the OC content of each organic material, in lbs/gal;

- c. the amount, in gallons, of each such organic material employed;
- d. the pounds of available OC, in pounds per day, calculated as (b) x (c);
- e. the pounds of OC emitted per day, calculated as (d) x (emission factor of 2%);
- f. the number of hours of operation; and
- g. the average hourly emissions, calculated as (e) / (f).

[Note: Emission factor of 2% is taken from Table 5.2 from AP-42, Average Emission Estimation Equations by Process. 40 CFR 63.5799(a) states emission factors from AP-42 may be used.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

- 2. The permittee shall collect the following records each month from cleanup operations:
  - a. the identification of each organic material employed for cleanup;
  - b. the OC content of each organic cleanup material, in pounds per gallon;
  - c. the number of gallons of each organic cleanup material employed; and
  - d. the emissions from cleanup, in pounds OC per month, calculated as the sum of (b) x (c) for each organic material employed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

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#### IV. Reporting Requirements

- 1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31, and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which the average OC emissions from the RTM process exceeded 8 pounds per hour, and the actual OC emissions for each such hour.
  - b. The permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from the RTM process exceeded 40 pounds, and the actual OC emissions for each such day.
  - c. The permittee shall submit written quarterly deviation (excursion) reports that include an identification of each month during which the OC emissions from cleanup exceeded 667 pounds, and the actual OC emissions from cleanup for each such day.
  - d. The permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

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#### V. Testing Requirements

- 1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
    - 8 lbs per hour of OC from the RTM process
    - Applicable Compliance Method:
    - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.g.
  - b. Emission Limitation:
    - 40 lbs per day of OC from the RTM process
    - Applicable Compliance Method:
    - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.e.
  - c. Emission Limitation:
    - 7.3 tons per year of OC from the RTM process
    - Applicable Compliance Method:
    - Compliance shall be demonstrated by summing the calculated daily emissions, based upon the record

keeping requirements specified in section A.III.1.e for each calendar year, and then dividing by 2000 lbs/ton.

d. Emission Limitation:

667 lbs per month of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.d.

e. Emission Limitation:

4.0 tons per year of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by summing the calculated monthly emissions as specified in section A.III.2.d for each calendar year, and then dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20534]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0204030456 Emissions Unit ID: P101 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0204030456 Emissions Unit ID: R101 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. 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>
R101 is a tooling and gel coat booth	OAC rule 3745-31-05(A)(3) (PTI 02-20427)	Organic compounds (OC) emissions shall not exceed 7.3 tons per year from tooling and gel coat.  OC emissions shall not exceed 366 lbs per month and 2.2 tpy from cleanup.
	OAC rule 3745-21-07(G)(2)	See section A.II.1 below. OC emissions shall not exceed 8 lbs per hour and 40 lbs per day from tooling and gel coat.
	40 CFR Part 63, Subpart WWWW	See Part II, sections A.2 and A.3 and Attachment 1 for the applicable requirements of this rule.
	40 CFR Part 63, Subpart A	Should Subpart WWWW be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. See Part II, section A.4 and Attachment 1 for the applicable requirements of this rule.  Should Subpart A be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

**2. Additional Terms and Conditions**

- a. The permittee shall comply with the organic hazardous air pollutant (HAP) emission limitations in accordance with Table 3 in 40 CFR Part 63, Subpart WWWW which is included in the text of Attachment 1 hereto, and is hereby incorporated into this term as if fully rewritten.

- (a) [Authority for term: 40 CFR 63.5805(b) and PTI 02-20427]

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**II. Operational Restrictions**

1. Acetone shall be the only OC material employed for cleanup.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-20427]

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

1. The permittee shall collect the following information each day;
  - a. the name and identification of each resin, gel coat and cleanup material employed;
  - b. the OC (HAP) content, in percent by weight, for each resin, gel coat and cleanup material;
  - c. the amount of each neat resin, neat gel coat and cleanup material employed, in gallons;
  - d. the weight of any OC added to the neat resins/gel coats, in lbs;
  - e. the time period, in hours, over which each resin and gel coat was employed;
  - f. determine the emission factor for each resin and gel coat in each process stream, using Table 1 in 40 CFR Part 63, Subpart WWWW which is included in the text of Attachment 1 hereto, or the most recent update to Table 1 in 40 CFR Part 63, Subpart WWWW;
  - g. the styrene emissions for each neat resin and neat gel coat in each process stream, in lbs/day, calculated using the emission factor(s) calculated in section A.III.1.f and the neat resin and neat gel coat usage in section A.III.1.c;
  - h. the total daily OC emissions from the tooling and gel coat operation, calculated as the sum of emissions from each process stream calculated in section A.III.1.g plus the emissions calculated from OC added in section A.III.1.d;
  - i. the emissions, in lbs/hour, for all resins and gel coats employed (calculated as A.III.1.h./A.III.1.e.); and
  - j. the daily emissions from cleanup (calculated as A.III.1.b x A.III.1.c).

Note: All OC employed in the resins and gel coats are also HAP.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20427]

2. The permittee shall collect the following information each month;
  - a. the monthly OC emissions from cleanup, calculated by summing the daily emissions determined in section A.III.1.j.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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**IV. Reporting Requirements**

1. The following quarterly deviation reports shall be submitted as required by the General Terms and Conditions contained in this permit, by April 30, July 31, October 31 and January 31, and shall cover the records of the previous calendar quarter.
  - a. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the average hourly OC emission rate from the tooling and gel coat operation exceeded 8 pounds per hour, and the actual average hourly OC emission rate for each such hour.
  - b. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the total OC emission rate from the tooling and gel coat operation exceeded 40 pounds per day, and the actual OC emission rate for each such day.
  - c. The permittee shall submit deviation (excursion) reports that include an identification of each month during which the total OC emission rate from cleanup exceeded 366 pounds per month, and the actual OC emission rate for each such month.
  - d. The permittee shall submit written quarterly deviation (excursion) reports that include an identification of each day during which an organic material other than acetone was employed for cleanup, and the actual OC emissions for each such day.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-20427]

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
    - 8 lbs per hour of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.i.

b. Emission Limitation:

40 lbs per day of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.h.

c. Emission Limitation:

7.3 tons per year of OC from the tooling and gel coat operation

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily emissions, as calculated in section A.III.1.h, for the calendar year, and then dividing by 2000 lbs per ton.

d. Emission Limitation:

366 lbs per month of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section A.III.2.a.

e. Emission Limitation:

2.2 tons per year of OC from cleanup

Applicable Compliance Method:

Compliance shall be demonstrated by summing the monthly OC emissions from cleanup, as calculated in section A.III.2.a, for the calendar year, and then dividing by 2000 lbs per ton.

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VI. **Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
2. <b>Additional Terms and Conditions</b>		

1. None

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**II. Operational Restrictions**

1. None

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

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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**VI. Miscellaneous Requirements**

1. None