



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

**RE: FINAL PERMIT TO INSTALL  
STARK COUNTY  
Application No: 15-01652  
Fac ID: 1576081952**

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE: 2/27/2007**

Former Monarch Rubber Plant No. 1  
Mark Thomasen  
15 Prestbury Square Building Suite 18  
Newark, DE 19713

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

Canton LAA



Permit To Install  
Terms and Conditions

Issue Date: 2/27/2007  
Effective Date: 2/27/2007

**FINAL PERMIT TO INSTALL 15-01652**

Application Number: 15-01652

Facility ID: 1576081952

Permit Fee: **\$400**

Name of Facility: Former Monarch Rubber Plant No. 1

Person to Contact: Mark Thomasen

Address: 15 Prestbury Square Building Suite 18  
Newark, DE 19713

Location of proposed air contaminant source(s) [emissions unit(s)]:

**10 Lincoln Park  
Hartville, Ohio**

Description of proposed emissions unit(s):

**This is a State Only permit to install for a soil vapor recovery system equipped with a thermal oxidizer.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be 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 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 (i.e., postmarked) quarterly 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. Records Retention Requirements**

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 for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a

reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

#### **10. 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.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. 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.

#### **13. Source Operation and Operating Permit Requirements 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, 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 emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.0

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

**Operations, Property, and/or Equipment - (P001) - Soil vapor extraction system permitted with an alternative operating scenario to operate with a thermal oxidizer with a 0.1 second residence time and a minimum 600 degree F inlet temperature to maintain compliance.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to any criteria pollutant(s) from this air contaminant source since the uncontrolled potential to emit for all criteria pollutants is less than ten tons per year.</p> <p>9.0 tons VOC/year (50 lbs VOC/day based on 365 day operation)</p>
Alternative Operating Scenario:	
OAC rule 3745-31-02(A)	<p>Permit to Install 15-01652 for this air contaminant source takes into account voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction consists of using a thermal catalytic oxidizer that operates with minimum 0.1 second residence time.</p> <p>9.0 tons VOC/year (50 lbs VOC/day based on 365 day operation)</p>

**2. Additional Terms and Conditions**

- 2.a This emission unit is permitted at its potential to emit (PTE). Therefore, there are no monitoring and record keeping requirements for the operation of the DPVE system. However, should the emissions unit be required to operate under the alternative operating scenario(AOS) specified in sections B through D below, this emission unit will be permitted at its post-controls potential to emit (PTE) of 9 tpy. Under the AOS, the permittee shall comply with the monitoring, record keeping and reporting requirements for the operation of the thermal catalytic oxidizer control device servicing this emission unit as specified in sections B thru D in order

to demonstrate that the catalytic oxidizer will maintain the VOC emission rate to below 9 tpy.

- 2.b** The permittee shall implement the alternative operating scenario(AOS) as specified in sections B.1, C.3, and D.1 of this PTI when one of the following conditions occur:
- i. upon written notification from the Canton laa
  - ii. when the mass emission rate of VOC from this emission unit exceeds 50 lbs VOC/day
  - iii. when the permittee decides that it is necessary to implement the AOS to maintain compliance with the 9 tons VOC/year emission limitation.
- 2.c** The permittee shall provide written justification to the Canton laa for not implementing the AOS in accordance with section D.5 when required under section A.2.b.i or A.2.bii.
- 2.d** The permittee shall comply with all terms and conditions of this PTI while operating under the AOS.

## **B. Operational Restrictions**

1. Alternative operating scenario Operational Requirements:
  - a. The permittee shall route all emissions from the knock out tank of the dual phase VOC extraction(DPVE) system to the inlet of the thermal catalytic oxidizer control device servicing this emission unit while operating under the alternative operating scenario.
  - b. The permittee shall operate the thermal catalytic oxidizer in manner that provides a minimum residence time of 0.1 seconds by maintaining a maximum gas flow rate of 500 scfm gas through the oxidizer.
  - c. The permittee shall maintain a minimum inlet temperature to the thermal catalytic oxidizer of 600 degree F and a minimum temperature catalyst bed temperature of 550 degree F at all times while the DPVE system is operating. The thermal catalytic oxidizer shall be equipped with an auto shutdown system which will prevent contaminated gases to enter the thermal oxidizer if the inlet temperature drops below 600 degree F. The DPVE system shall be interlocked with the thermal oxidizer preventing the DPVE system to operate when the inlet temperature is less than 600 degree F. The flow control and DPVE interlock systems shall be operated and maintained in accordance with manufacturer's recommendations.
  - d. The permittee shall operate the thermal catalytic oxidizer until such time when the permittee can provide to the Canton local air agency sufficient analytical data

demonstrating that uncontrolled emissions comply with the annual mass emission limitation specified in section A.1. The permittee shall continue to operate the thermal catalytic oxidizer until approval to discontinue it's use is provided by the Canton laa.

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

1. The permittee shall monitor and maintain records of the VOC concentration, in microgram per cubic meter and gas flow rate, in scfm, at the discharge of the DPVE system on a monthly basis according to manufacturer's recommendations and sampling and testing methods approved by the Canton laa. Monthly monitoring shall take place within the first full week of each month.
2. The permittee shall calculate and maintain records of the lbs VOC discharged per day from this emissions unit based on the concentration and gas flow rate measured in accordance with section C.1 above.
3. Alternative Operating Scenario Monitoring and Record keeping Requirements:
  - a. The permittee shall operate and maintain continuous temperature and gas flow monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed and the gas flow, in dscfm, through the catalyst bed when the emissions unit is in operation. Temperature units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
  - b. The permittee shall monitor and maintain records of the air VOC concentrations at the influent to and effluent of the thermal oxidizer on a monthly basis in order to determine the destruction efficiency of the oxidizer according to manufacturer's recommendations. Monthly monitoring shall take place within the first full week of each month.
  - c. The catalyst bed material shall be inspected for general catalyst condition and/or replaced when the destruction efficiency drops less than 90 % based on the monthly monitoring results as specified in section C.2 above. An evaluation of the catalyst bed material shall be conducted whenever the results of the inspection or operational problems with the thermal catalytic oxidizer indicate signs of potential catalyst depletion or poor catalyst condition based on manufacturer's recommendations. Selection of the testing company and/or specialist and procedures used for inspections, replacement, or testing of the catalyst material shall be in accordance with catalyst manufacturer's recommendations. Inspections of the catalyst bed shall be also be conducted when temperature monitoring records

indicate a sustained decrease in oxidizer temperature. The Canton local air agency shall be notified, in writing, of the date of any inspections or catalyst replacements.

4. The permit to install for this emissions unit P001 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 1,1,1 - Trichloroethane(TCA)  
TLV (mg/m<sup>3</sup>): 350 ppm (1900 mg/m<sup>3</sup>)  
Maximum Hourly Emission Rate (lbs/hr): 2.04 lb/hour  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 626  
MAGLC (ug/m<sup>3</sup>): 45,238

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
5. 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 solely due to the emissions of any type of toxic air contaminant not

previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the 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. Alternative Operating Scenario Reporting Requirements**

- a. The permittee shall submit a detailed and signed catalyst evaluation report resulting from any catalyst testing conducted. The report shall provide the name and address of the testing company, date the sample was collected and analyzed, the sampling techniques and methods used to collect and analyze the sample, the results of all analyses, an interpretation of all the data collected, and an evaluation by the manufacturer of the incinerator catalyst's current and future capability to meet the control and capture efficiencies required by this permit based on their expertise and the test report data.
- b. The permittee shall submit a written report following any inspections conducted on the catalyst bed. The inspection reports shall include the name of the inspector, the company employing the inspector, the date and time of the inspection, and the results of the inspection including a detailed description of the catalyst bed, any problems or concerns observed with the bed, and whether further catalyst evaluation is necessary.
- c. The permittee shall submit a quarterly deviation(excursion) report which identifies all time periods, while the thermal catalytic oxidizer(TCO) is operating, when:
  - i. the inlet temperature to the TCO is below 600 degree F;
  - ii. the temperature of the catalyst bed of the TCO is below 550 degree F; and/or
  - iii. the gas flow rate through the catalyst bed of the TCO exceeds 500 scfm.

4. The permittee shall submit to the Canton laa a monthly written report identifying the lbs VOC/day calculated in section C.1. The report will contain all field data used and calculations as well as a description of any emission unit (and/or control device) problems, and subsequent remedial actions taken to resolve those problem(s). The report shall be submitted within 30 calendar days following the date of field data retrieval.
5. The permittee shall submit the justification specified in section A.2.b within 14 days following receipt of the request for implementation of the AOS from the Canton laa. The justification shall include a complete and detailed explanation, with supporting documentation, sufficient to demonstrate that implementation of the AOS is unnecessary. The request shall also include all sampling and analytical QA/QC information and procedures used for sampling and analysis.
6. The permittee shall notify the Canton laa, in writing, any time the AOS is implemented or discontinued. The notification shall include the a complete and detailed reason for the AOS action being taken.

**E. Testing Requirements**

1. Compliance with the emission limitations of this permit shall be demonstrated by using the following methods and procedures:
  - a. Emission Limitation:  
  
9 tons VOC/yr. and 50 lbs VOC/day  
  
Applicable compliance method:  
  
The permittee shall demonstrate compliance by the monitoring and record keeping requirements specified in sections C.1 and C.2.

**F. Miscellaneous Requirements**

None

**Former Monarch Rubber Plant No. 1****PTI Application: 15-01652****Issued: 2/27/2007****Facility ID:****1576081952**SIC CODE 3069 SCC CODE 99999383767773773 EMISSIONS UNIT ID P001EMISSIONS UNIT DESCRIPTION Soil vapor extraction system equipped with a thermal oxidizer with a 0.1 second residence timeDATE INSTALLED TBD

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds					9.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **NO**NESHAP? **NO**PSD? **NO**OFFSET POLICY? **NO****WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Enter Determination** Permit to Install 15-01652 for this air contaminant source takes into account voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3). The voluntary restriction consists of using a thermal catalytic oxidizer that operates with minimum 0.1 second residence time.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YESOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES      NOIDENTIFY THE AIR CONTAMINANTS: 1,1,1 - Trichloroethane