

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
B1559

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B1559-2014

**St Barbara Cement, Inc.  
St. Marys Cement, Inc. (US)**

SRN: B1559

Located at:

16000 Bells Bay Road, Charlevoix, Charlevoix County, Michigan 49720

Permit Number: MI-ROP-B1559-2014

Staff Report Date: April 7, 2014

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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**APRIL 7, 2014 - STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	St. Marys Cement, Inc. (US) 16000 Bells Bay Road Charlevoix, Michigan 49720
Source Registration Number (SRN):	B1559
North American Industry Classification System (NAICS) Code:	327310
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201200092
Responsible Official:	Dirk Cox, Operations Manager 231-237-1322
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411
Date Permit Application Received:	June 18, 2012
Date Application Was Administratively Complete:	June 20, 2012
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	April 7, 2014
Deadline for Public Comment:	May 7, 2014

## **Source Description**

St. Marys Cement, Inc. (US) is a cement manufacturing facility located on the shores of Lake Michigan at 16000 Bells Bay Road in Charlevoix, Charlevoix County, Michigan. Cement manufacturing has been occurring at this site since circa 1966. In April 2005 St. Marys Cement, Inc. (US) purchased the operations from CEMEX. The total area of the facility, including the quarry is approximately 1370 acres. The actual production and shipping facilities occupy approximately 80 acres.

The plant operates one dry process rotary kiln. The kiln typically operates 24 hours per day, 7 days a week, for approximately 300 days in the year. The kiln system is rated at 4840 tons of clinker per day or 1.77 million tons of clinker per year. The kiln uses a combination of coal, petroleum coke, alternative fuels and propane as a fuel source. Raw materials are ground and mixed including various materials from on-site and off-site sources. The requirements for the process include approximately 80 percent calcium oxides, 10 percent aluminum oxides, 5 percent iron oxide and 5 percent silica oxide. These oxides are typically derived from limestone, shale, bottom ash, fly ash, bauxite, mill scales, slags, various sands, numerous iron sources, clay, overburden and other sources. The majority of raw materials are obtained on-site from St. Marys Cement, Inc. (US) quarrying operations; all offsite materials are brought to the site by trucks and ships/barges.

The site includes: the quarry operations, conveying and storage systems for raw materials, grinding and blending the raw materials, the preheater tower (Precalciner), the kiln, clinker cooler, clinker conveying, clinker storage, clinker grinding (finish mills), cement storage systems, and shipping facilities.

Particulate from the kiln process is controlled by baghouses on both the main and bypass exhaust systems. Dust collectors, engineered controls, and/or dust suppression systems have been installed at various locations throughout the facility to control particulate matter from other processes.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2012** submittal.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	3893
Lead (Pb)	<1
Nitrogen Oxides (NO <sub>x</sub> )	2369
Particulate Matter (PM)	454
Sulfur Dioxide (SO <sub>2</sub> )	2560
Volatile Organic Compounds (VOCs)	170
Ammonia	5

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO<sub>2</sub>e is 1,313,130.00 tons. CO<sub>2</sub>e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are addressed in the non-applicable requirement part of the Staff Report and Part E of the ROP.

The stationary source is located in Charlevoix County, which is currently designated as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit oxides of nitrogen, sulfur dioxide, carbon monoxide, VOC and particulate matter exceeds 100 tons for each pollutant; the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112 is greater than 10 tons per year and the potential to emit of all HAPs combined is greater than 25 tons per year; and the potential to emit of Greenhouse Gases is 100,000 tons per year or more calculated as carbon dioxide equivalents (CO<sub>2</sub>e) and 100 tons per year or more on a mass basis.

EUKILN, EUCLINKERCOOL and EURAWMILLS at the stationary source were subject to review under the Prevention of Significant Deterioration regulations of 40 CFR, Part 52.21 because at the time of New Source Review Permitting the potential to emit oxides of nitrogen, sulfur dioxide, carbon monoxide and particulate matter were greater than 100 tons per year for each pollutant.

EUPORTABLECRUSHING and EUHAMMER at the stationary source are subject to the Standards of Performance for Non-metallic Mineral Processing Plants promulgated in 40 CFR, Part 60, Subparts A, and OOO.

EUKILN at the stationary source is subject to the Standards of Performance for Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units promulgated in 40 CFR, Part 60, Subparts A, and DDDD because St. Marys Cement is an existing source that utilizes non-hazardous secondary materials (asphalt flakes and recyclable plastics) as fuels.

EUCLINKERCOOL and EUKILN at the stationary source are subject to the Standards of Performance for Portland Cement Plants promulgated in 40 CFR, Part 60 Subparts A and F. Because the kiln and clinker cooler exhaust are combined and sent to a single control device the adjusted PM Emission limit from 40 CFR 63.1343(b) (per 40 CFR 60.62(b)(2)) applies to FGKILNRAWMILLS and is a combined limit for both the main and bypass stacks. Likewise, the EURAWMILLS exhaust is combined with the kiln exhaust. While EUCEMENTHAND & STO, and FGFINISHMILLS are technically subject to Subpart F there are no applicable requirements for these emission units because the only requirement that would be applicable is a 10% opacity limit which these emission units are also subject to under the PC MACT and is already included in the ROP.

EUCOALSYSTEM, EURAWMATHANDSTOR, EUCLINKERHAND, EUCEMENTHAND&STO, EUCKDHANDSTOR, EUFINISHMILL1, EUFINISHMILL2, and EUFINISHMILL3 at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry promulgated in 40 CFR, Part 63, Subparts A and LLL.

EUKILNDONKEY and EUEMERGENCYENGINE at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR, Part 63, Subparts A and ZZZZ.

The stationary source is currently under review by USEPA to determine if it is subject to the Regional Haze Regulations requiring Best Available Retrofit Technology (BART) to prevent and remedy any impairment of visibility in Class 1 areas (national parks and wilderness areas) as promulgated in 40 CFR, Part 51. Any BART requirements determined to apply to St Marys Cement will be established in a Permit to Install prior to incorporation into the ROP. At this time these requirements have not been established and this ROP does not contain BART requirements.

The stationary source is subject to USEPA Consent Decree Case No. 1:06-cv-607 which was issued on December 12, 2006 for past alleged violations of permits and Federal regulations. St. Marys Cement continues to submit annual reporting required by the Consent Decree and these requirements are included in the Renewable Operating Permit.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ's "Procedure for Evaluating Periodic Monitoring Submittals."

EUKILN at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of Particulate Matter (PM) greater than the major source threshold level. The CAM monitoring selected for the control device is the existing continuous opacity monitoring system (COMS) which was chosen because opacity can be used as a surrogate for PM emissions with appropriate ranges established during PM emissions testing. Additionally, the COMS provide a continuous means of monitoring the process emissions.

The emission limitations or standards for particulate matter from the kiln at the stationary source are subject to the federal CAM regulation under 40 CFR, Part 64 because the kiln is no longer subject to particulate emission limits addressed by 40 CFR, Part 63, Subpart LLL (PC MACT). Instead the kiln is subject to 40 CFR, Part 60, Subpart DDDD Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or before November 30, 1999 (CISWI). Therefore, the kiln is subject to CAM requirements for particulate matter. The CAM requirements are included in FGKILNRAWMILLS.

Several PTIs have been issued since the previous Renewable Operating Permit (ROP) including: 700-77L for installation of pre-heater flash furnace, 129-09 for reuse of the old landfill material, 204-09 for alternative raw materials (glass, refractory), 248-10A for the use of asphalt shingle fuel and chlorine free plastic fuel. Additionally, 700-77K for installation of a baghouse on EUKILN bypass was issued prior to the previous ROP but the baghouse has now been installed. Minor modifications have been submitted for each PTI and they are being incorporated into this ROP except PTI 700-77L, which has been voided as the equipment was never installed.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

### **Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B1559-2008 are identified in Appendix 6 of the ROP.

PTI Number			
700-771	370-06		

### **Streamlined/Subsumed Requirements**

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Stringency Analysis
FGKILNRAWMILLS	1.1	0.07lb/ton of clinker/40 CFR 60.62(a)(1)(iii)	0.25lb/1,000 lbs exhaust gas/ R 336.1331(1)(a)	The 0.07lb/ton of clinker limit is equivalent to 0.011lb/1,000lbs exhaust gas therefore this limit is more stringent than the 0.25lb/1,000 lbs exhaust gas limit.

### **Non-applicable Requirements**

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

### **Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUCOMBUSTION	Miscellaneous indirect heating, LPG combustion sources less than 50,000,000 btu/hr.	282(b)(i)	212(4)(b)
EUGASOLINE	500 gallon gasoline storage tank used to dispense fuel for mobile sources.	284(g)(i)	212(4)(c)
EUPROPANE	Twelve 500 to 3700 gallon stationary LPG tanks.	284(b)	212(4)(c)
EUGASOLINE1100	1,100 gallon gasoline AST used to dispense fuel for mobile sources.	284(g)(i)	212(4)(c)

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action taken by the DEQ**

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Janis Denman, Cadillac District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.



State Registration Number

## RENEWABLE OPERATING PERMIT

ROP Number

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**JUNE 25, 2014 - STAFF REPORT ADDENDUM**

MI-ROP-B1559-2014

### Purpose

A Staff Report dated April 7, 2014, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

### General Information

Responsible Official:	Dirk Cox, Operations Manager 231-237-1322
AQD Contact:	Kurt Childs, Environmental Quality Analyst 231-876-4411

### Summary of Pertinent Comments

No comments from the public were received during the comment period. The USEPA did provide several comments in a letter dated May 6, 2014. Those comments are summarized below.

### **STAFF REPORT**

USEPA commented that it has made a determination that St. Marys Cement will be subject to the Regional Haze Regulations requirement Best Available Retrofit Technology (BART) effective January 1, 2017. Since these requirements will become effective during the term of the renewal ROP, USEPA has requested that the BART requirements be included in the permit.

#### **April 7, 2014 DRAFT ROP**

EUPORTABLECRUSH SC I: USEPA comments identified an incorrect reference to another special condition.

EUPORTABLECRUSH SC VI.3: USEPA comments requested the condition include the test method and that clarification be provided that the monitoring is sufficient to assure compliance with the opacity limits.

FGKILNRAWMILLS SC I.2-4: EPA requested a more specific citation with regard to the underlying applicable requirement citation for 40 CFR 52.21.

FGKILNRAWMILLS SC I.1: The emission limit was not designated with Footnote "a" for streamlined requirements.

FGKILNRAWMILLS: USEPA requested the applicable requirements in 40 CFR 60.63(c) and 60.65 be added to several conditions.

FGKILNRAWMILLS SC VI.2: Requirement to calculate and record clinker production rate cites 52.21 as a UAR but there is no corresponding UAR on an emission limit or process limit.

FGKILNRAWMILLS SC V.1: General reference to 40 CFR Part 60 Appendix A test methods, more specific test methods should be identified.

FGKILNRAWMILLS SC V.2: USEPA commented that the condition was designated as federally enforceable but the nickel emission limit was designated as state only enforceable and questioned if the test condition should be redesignated as state only enforceable.

FGKILNRAWMILLS SC VI.9: USEPA questioned whether the baghouse pressure differential monitoring requirements are part of the parametric monitoring system required by 40 CFR 60.63(c) and if there were any applicable requirements in the Malfunction Abatement Plan as a result that should be included in the permit.

FGKILNRAWMILLS SC VI.12: USEPA requested that specific method for monitoring material feed rates be included in the condition.

FGKILNRAWMILLS SC IX.1: USEPA commented that emission guidelines are not directly applicable requirements; rather, Federal and State Plans promulgated pursuant to the Emission Guidelines establish the applicable requirements. USEPA also requested that the Regulatory Analysis section of the Staff Report be revised to include information pertaining to CISWI applicability, the status of the future CISWI Federal Plan and a commitment to revise/reopen the permit to include future CISWI requirements as applicable.

FGKILNRAWMILLS SC III.5: USEPA comment indicates that 52.21(c) and (d) are incorrect UARs.

FGFINISHMILLS SC V.1: USEPA comment indicates that 40 CFR 63.1349(b)(2) is an incorrect citation and the condition does not provide testing frequency.

FGALTSAND/SOIL SC V.1: USEPA requests the condition specify the method to determine lead and cadmium content of the extracted sand/soils.

### **Changes to the April 7, 2014 Draft ROP**

#### **STAFF REPORT**

A requirement was added to FGKILNRAWMILLS SC IX.5 indicating that St. Marys Cement must comply with applicable BART requirements effective January 1, 2017. AQD will re-open the ROP to incorporate specific BART requirements into the ROP at that time.

#### **April 7, 2014 DRAFT ROP**

EUPORTABLECRUSH SC I: The condition reference has been corrected.

EUPORTABLECRUSH SC VI.3: USEPA Method 22 was added to clarify the monitoring procedure and the wording was changed to specify test periods consistent with visible emission limits and require Method 9 reading to quantify opacity if visible emissions are detected. Daily visible emissions observations utilizing Method 22 are adequate as a primary monitoring method to demonstrate compliance with the opacity limits in accordance with 40 CFR 70.6(3)(i)(B) because the emission unit is operated sparingly and is required to be equipped with control equipment (water spray). Extended periods of visible emissions are not expected, if they do occur they will be quantified using Method 9.

FGKILNRAWMILLS SC I.2-4: The 52.21 UAR originated in PTI 700-77G no explanation was provided in the PTI evaluation form at that time. AQD Permits Unit confirmed the UAR was assigned due to review under 52.21(c) and (d) to ensure SO2 emissions did not exceed ambient air increment and for NAAQS modeling. The UAR has been updated.

FGKILNRAWMILLS SC I.1: Footnote "a" was added to the emission limit.

FGKILNRAWMILLS: UAR 40 CFR 60.63(c) was added to SC V.1 and VI.4. 40 CFR 60.65 was added to SC VII.7. Also SC VI.18 was added to include the requirements of 40 CFR 60.7 referred to in 40 CFR 60.65.

FGKILNRAWMILLS SC VI.2: Added "(c) and (d)" to 52.21 UAR on this condition and added 52.21(c) and (d) to the clinker production process limit in SC III.1. Also added "(c) and (d)" to SC VI.7 and VI.8.

FGKILNRAWMILLS SC V.1: Language was changed to reference specific PM testing identified in NSPS Subpart F, 40 CFR 60.64(a).

FGKILNRAWMILLS SC V.2: The testing condition originated in an AQD Permit to Install and is based on State of Michigan air toxics regulations. Therefore it has been redesignated as a state only enforceable requirement.

FGKILNRAWMILLS SC VI.9: AQD believes the COMS adequately address the parametric monitoring system requirements of 40 CFR 60.63(c) (which have been cited as UARs in the COMS conditions) and therefore the differential pressure monitoring requirements do not need to cite this UAR.

FGKILNRAWMILLS SC VI.12: Additional information indicating that an in-line belt scale is used to monitor feed rates, and has been added to the condition.

FGKILNRAWMILLS SC IX.1: This condition has been changed to an informational statement regarding the applicability of CISWI and the requirement to comply with all applicable requirements of the Federal or State Plan that is eventually implemented. The Staff Report should have included a regulatory analysis of the applicability of the CISWI regulations to St. Marys Cement. The Staff Report cannot be revised after the public comment period but the CISWI analysis is being provided in this Addendum as follows:

The stationary source is currently permitted to burn alternate fuels which will subject St. Marys Cement to Federal/State plans that are implemented in the future to enforce emissions guidelines promulgated pursuant to the New Source Performance Standards 40 CFR Part 60, Subpart DDDD Commercial/Industrial Solid Waste Incinerators. The Federal plan compliance date is February 7, 2018.

FGKILNRAWMILLS SC III.5: Per discussion with AQD Permits Unit, UAR 40 CFR 52.21(c) and (d) are the correct citations, they apply to ambient air quality increments and NAAQS modeling. PTI limits are set to comply with these limits.

FGFINISHMILLS SC V.1: 40 CFR 63.1349(b)(2) is the correct UAR. The ROP condition is directly from the PCMACT. 40 CFR 63.149(c) specifies testing frequencies for Dioxin, Hap, HCL and for PM (12 months) but no testing frequency is specified for opacity. 63.1349(b)(2) does refer to "opacity tests" (plural). Added 12 months testing frequency since more than one test is inferred and this is the frequency specified for PM.

FGALTSAND/SOIL SC V.1: St. Marys Cement has removed and processed most of the material from the old landfill. The processed material is stored on the quarry floor where it has been sampled for lead and cadmium content, using USEPA 6000/7000 series test methods for total metals. These test methods have been added to the permit condition language.

Following the correction of the Draft ROP in response to USEPA comments the AQD is required to provide a review period for the permittee to review the changes. The permittee review period took place from May 29 to June 13, 2014. As a result of that review, St. Marys Cement commented that the 40 CFR Part 60, Subpart F PM limit in FGKILNRAWMILLS did not apply. A great deal of review, research, and discussions took place resulting in a determination by the USEPA's Subpart F expert Sharon Nizich that, since FGKILNRAWMILLS at St. Marys Cement is subject to CISWI it is not subject to Subpart F or 40 CFR Part 63, Subpart LLL for that matter. Other affected sources under Subpart F remain subject since CISWI only applies to FGKILNRAWMILLS. As a result, the following changes have also been made to the Draft ROP:

FGKILNRAWMILLS SC I.1: The PM limit has been changed back to the AQD Air Pollution Control Rule Number R 336.331(1)(a) limit of 0.25lb/1000 lb exhaust gas which had been subsumed under the Subpart F limit.

FGKILNRAWMILLS SC V.1: The underlying applicable requirements from Subpart F have been replaced with R 336.1331(1)(a).

FGKILNRAWMILLS SC V.4: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC VI.1: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC VI.3: The underlying applicable requirements from Subpart F have been replaced with R 336.1213(3).

FGKILNRAWMILLS SC VI.4: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC VI.20: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC VII.7: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC VII.16: The underlying applicable requirement from Subpart F has been removed.

FGKILNRAWMILLS SC IX.2: The special condition requiring general compliance with Subpart F has been removed.

FGFINISHMILLS SC I.1: 40 CFR 60.62(c) was added as an underlying applicable requirement.

FGKILNNONFACILITY SC I.1: 40 CFR 60.62(c) was added as an underlying applicable requirement.