MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

January 20, 2022

PERMIT TO INSTALL 348-99A

ISSUED TO The Worden Group

LOCATED AT

200 East 17th Street Holland, Michigan 49423

IN THE COUNTY OF

Ottawa

STATE REGISTRATION NUMBER B6356

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

October 14, 2021

DATE PERMIT TO INSTALL APPROVED: January 20, 2022	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD BACT CAA CAM CEMS CFR COMS Department/department/EGLE EU FG GACS GC GHGS HVLP ID IRSL ITSL LAER MACT MAERS MAP MSDS NA NAAQS NESHAP NSPS NSR PS PSD PTE PTI RACT ROP SC SCR SCR SCR SCR SCR SCR SCR SCR SCR	Air Quality Division Best Available Control Technology Clean Air Act Compliance Assurance Monitoring Continuous Emission Monitoring System Code of Federal Regulations Continuous Opacity Monitoring System Michigan Department of Environment, Great Lakes, and Energy Emission Unit Flexible Group Gallons of Applied Coating Solids General Condition Greenhouse Gases High Volume Low Pressure* Identification Initial Risk Screening Level Initial Threshold Screening Level Lowest Achievable Emission Rate Maximum Achievable Control Technology Michigan Air Emissions Reporting System Malfunction Abatement Plan Material Safety Data Sheet Not Applicable National Ambient Air Quality Standards National Emission Standard for Hazardous Air Pollutants New Source Performance Standards New Source Review Performance Specification Prevention of Significant Deterioration Permanent Total Enclosure Permit to Install Reasonable Available Control Technology Renewable Operating Permit Special Condition Selective Catalytic Reduction State Registration Number To Be Determined Toxicity Equivalence Quotient United States Environmental Protection Agency Visible Emissions
VE	

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm BTU °C CO CO ₂ e dscf dscm °F gr HAP Hg hr HP H ₂ S KW Ib m mg mm MM MW NMOC NO _x ng PM PM10 PM10 PM2.5 pph PM10 PM2.5 pph ppmv ppmv ppmv ppmv ppmv ppmv ppmv	Actual cubic feet per minute British Thermal Unit Degrees Celsius Carbon Monoxide Carbon Dioxide Equivalent Dry standard cubic foot Dry standard cubic meter Degrees Fahrenheit Grains Hazardous Air Pollutant Mercury Hour Horsepower Hydrogen Sulfide Kilowatt Pound Meter Milligram Millimeter Milligram Millimeter Million Megawatts Non-Methane Organic Compounds Oxides of Nitrogen Nanogram Particulate Matter Particulate Matter Particulate Matter equal to or less than 10 microns in diameter Particulate Matter Parts per million by volume Parts per million by volume Parts per million by weight Pounds per square inch absolute Pounds per squ
tpy	Tons per year
hà	Microgram Micrometer of Microp
µm VOC	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (**R 336.1370**)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUSPRAY	Eight wood furniture dry filter spray booths.	NA
EUADHESIVE	Two wood furniture adhesive spray booths.	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EUSPRAY EMISSION UNIT CONDITIONS

DESCRIPTION

Eight wood furniture dry filter spray booths.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dry filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	36 tpy	12-month rolling time period as determined at the end of each calendar month	EUSPRAY	SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste purge and cleanup solvents and shall store them in closed containers. The permittee shall dispose of all waste purge and cleanup solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSPRAY unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1901, R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

 The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1702)

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and clean up solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a monthly basis for EUSPRAY:
 - a) Gallons (with water) of each coating used.
 - b) VOC content (with water) of each coating as applied.
 - c) Gallons of each solvent used.
 - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack a	& Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-WF-B	SOOTH-01	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-WF-B	OOTH-02	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-WF-B	SOOTH-03	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-WF-B	SOOTH-04	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV-WF-B	OOTH-05	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV-WF-B	OOTH-06	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV-WF-B	OOTH-07	34	26	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV-WF-B	OOTH-08	34	26	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

EUADHESIVE EMISSION UNIT CONDITIONS

DESCRIPTION

Two wood furniture adhesive spray booths.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dry filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	38 tpy	12-month rolling time period as determined at the end of each calendar month	EUADHESIVE	SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste purge and cleanup solvents and shall store them in closed containers. The permittee shall dispose of all waste purge and cleanup solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUADHESIVE unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1901, R 336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

 The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1702)

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and clean up solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a monthly basis for EUADHESIVE:
 - a) Gallons (with water) of each coating used.
 - b) VOC content (with water) of each coating as applied.
 - c) Gallons of each solvent used.
 - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-ADH-Booth-12	34	20	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-ADH-Booth-13	34	20	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

			Time Period /		Monitoring / Testing	Underlying Applicable
	Pollutant	Limit	Operating Scenario	Equipment	Method	Requirements
1.	PM	0.01 pound per	Hourly	Each dust	SC V.2	R 336.1205(1)(a)(ii)
		1,000 pounds		collector in		
		of exhaust		FGFACILITY		
		gases ^a		(when exhausting		
				externally)		
2.	VOC	Less than 89.9	5	FGFACILITY	SC VI.3	R 336.1205(1)(a)(ii)
		tpy	period as determined at			
			the end of each			
			calendar month			
3.	Each	Less than 8.9	12-month rolling time	FGFACILITY	SC VI.4	R 336.1205(3)
	Individual	tpy	period as determined at			
	HAP		the end of each			
			calendar month			
4.	Aggregate	Less than 22.4	12-month rolling time	FGFACILITY	SC VI.4	R 336.1205(3)
	HAPs	tpy	period as determined at			
			the end of each			
			calendar month			
a C	Calculated on a dry gas basis					

5. Visible emissions from each dust collector in FGFACILITY, when exhausting externally, shall not exceed a six-minute average of 10 percent opacity. (R 336.1205(3))

II. MATERIAL LIMIT(S)

						Monitoring /	Underlying
		VOC		Time Period /		Testing	Applicable
	Material	Content	Limit	Operating Scenario	Equipment	Method	Requirements
1.	. Coatings	6.0 lb/gal	12,000 gal/yr	12-month rolling time	FGFACILITY	SC VI.3	R 336.1205(1)(a)(ii)
		(as		period as determined	(EUSPRAY		
		applied)		at the end of each	portion)		
				calendar month			
2	. Coatings	4.5 lb/gal	16,889 gal/yr	12-month rolling time	FGFACILITY	SC VI.3	R 336.1205(1)(a)(ii)
		(as		period as determined	(EUADHESIVE		
		applied)		at the end of each	portion)		
				calendar month			

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate the woodworking equipment, when exhausting externally, unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the dust collectors in FGFACILITY, has been submitted within 45 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1205(1)(a)(ii), R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the woodworking equipment, when exhausting externally, unless each dust collector in FGFACILITY is installed, maintained, and operated in a satisfactory manner acceptable to the AQD District Supervisor, which includes operation of each dust collector according to the manufacturer's specifications or alternate documentation acceptable to the AQD District Supervisor. (R336.1205(1)(a)(ii))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall determine the HAP content of any material, as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))
- Upon request from the AQD District Supervisor, the permittee shall verify the PM emission rate of each dust collector in FGFACILITY, when exhausting externally, in FGFACILITY by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference	
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution	
	Control Rules	

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205(1)(a)(ii), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a)(ii), R 336.1205(3))
- The permittee shall perform visible emissions observations during operation once each calendar day from each dust collector in FGFACILITY, when exhausting externally. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If the permittee observes visible emissions above 10% opacity, the permittee shall immediately initiate corrective actions or operational changes to reduce visible emissions below 10% opacity. (R 336.1205(1)(a)(ii))
- 3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each VOC-containing material used.
 - b) VOC content (with water) of each coating as applied.
 - c) VOC emission calculations determining the monthly emission rate of each in tons per calendar month.
 - d) VOC emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a)(ii))

- 4. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).