



AIR QUALITY PROGRAM
301 39th Street, Bldg. #7
Pittsburgh, PA 15201-1811

Minor Source/Minor Modification
INSTALLATION PERMIT

Issued To: **ATI Flat Rolled**
 Products Holdings, LLC
 100 River Road
 Brackenridge, PA 15014-1597

ACHD Permit #: **0059-I009a**

Date of Issuance: December 3, 2020

~~**Expiration Date:**~~ ~~**(See Section III.12)**~~

Issued By: 
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V. EMISSION UNIT LEVEL TERMS AND CONDITIONS**Pages 2 through 16
have been redacted.****A. Process P001 (A): Electric Arc Furnaces (F1 and F2)****1. Restrictions:**

- ~~a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)~~
- b. The permittee shall at not conduct, or allow to be conducted, F1 or F2 process operations unless the furnace pollution control equipment is on line and properly maintained and operated according to the following conditions: (2102.04.b.5, 25 Pa. Code §129.99)
- 1) F1 and F2 shall be equipped with a direct evacuation control (DEC) system with water cooled ductwork;
 - 2) The fugitive emissions capture equipment shall consist of segmented canopy hood systems exhausting to baghouses C002B and C006, cross-draft partitions, a scavenger duct and closed roofs. The scavenger duct systems shall be installed in the exhaust duct work between each canopy where it will be most effective, based on the canopy and duct configuration and design;
 - 3) The F1 DEC system shall be in place and operating at all times during furnace operations and shall be exhausted to C001 baghouse;
 - 4) The F2 DEC system shall be in place and operating at all times during furnace operations and shall be exhausted to the C002A baghouse
 - 5) F1 and F2 shall be equipped with canopy hoods for collection of process fugitive emissions. Such hoods shall be in operation at all times during process steel making operations and emissions shall be exhausted to the C002B (F2 canopy) baghouse and C006 (F1 canopy) baghouse, respectively;
 - 6) The differential pressure drop across each baghouse compartment shall not exceed 15 in. w.c.;
 - 7) The differential pressure drop across each compartment in the F1 and F2 DEC and canopy baghouses, shall be recorded once per week, during furnace operations.
 - 8) Should the differential pressure across a baghouse exceed 15 in. w.c., the permittee shall promptly investigate the cause of the deviation. The permittee shall record and maintain records of the following information for each investigation:
 - a) The date and time the deviation was observed;
 - b) The magnitude of the deviation observed;
 - c) The date(s) the investigation was conducted;
 - d) The findings, recommendations and corrective actions for the investigation; and
 - e) The pressure drop reading after the deviation was corrected.
 - 9) The permittee shall take prompt action to correct any deviation and bring the control equipment back to normal operating parameters.
- c. The permittee shall maintain compliance with 40 CFR Part 63 Subpart YYYYYY. (2102.04.b.5, 25 Pa. Code §129.99)

~~2. Testing Requirements:~~

~~The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~

3. Monitoring Requirements:

- a. The permittee shall check and record the fan motor amperes and damper positions for the F1 and F2 emission control systems on a once-per-shift basis. (§2103.12.i, 40 CFR 60.274a(b), 25 Pa. Code §129.100)
- b. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system and baghouses for F1 and F2. These inspections shall include observations of the physical appearance of the equipment. Any deficiencies shall be noted and proper maintenance performed. (§2103.12.i, 2102.04.b.5, 40 CFR 60.274a(d), 25 Pa. Code §129.100)
- c. The permittee shall have instrumentation to continuously monitor the differential pressure drop across each compartment of the F1 and F2 DEC and Canopy baghouses during operation of F1 and F2. Said instrumentation shall be properly operated, calibrated and maintained according to manufacturer's specifications. (§2103.12.i, §2103.12.a.2.D, 25 Pa. Code §129.100)
- d. The permittee shall inspect F1 and F2, the C001 and C002A DEC baghouses, and the C002B canopy and C006 canopy baghouses weekly for to insure proper operation and compliance with permit conditions. (§2103.12.i, 2102.04.b.5, 25 Pa. Code §129.100)

4. Record Keeping Requirements:

- a. The permittee shall record and maintain the following data for the F1 and F2 and associated control equipment: (2102.04.b.5, §2103.12.j, 40 CFR §60.276a, 40 CFR 63.10685, 25 Pa. Code §129.100)
 - 1) Monthly operational status inspections;
 - 2) Fan motor amp and damper position data;
 - 3) Monthly and 12-month production for each furnace; and
 - 4) Records of operation, maintenance and inspections.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, §2103.12.h.1, 25 Pa. Code §129.100)
- c. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 40 CFR §60.276(a), 25 Pa. Code §129.100)

5. Reporting Requirements:

- a. The permittee shall report the following information to the Department in its semiannual report. The reports shall contain all required information for the time period of the report: (§2103.12.k, 40 CFR §60.276a, 25 Pa. Code §129.100)
 - 1) Monthly and 12-month summaries of data required to be recorded by Condition V.A.4.a above. Monthly fan motor amperes data shall consist of the monthly maximum and minimum values observed for each fan; and
 - 2) Non-compliance information required to be recorded by Condition V.A.4.b above.

- ~~b. Reporting instances of non-compliance in accordance with Condition V.A.5.a above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above if appropriate. (§2103.12.k)~~

6. Work Practice Standards:

- a. EAFs F1 and F2 shall be: (§210.04.b.5, RACT Order No. 260, Condition 1.3, 25 Pa. Code §129.99)
- 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
 - 2) Operated and maintained in a manner consistent with good operating and maintenance practices to include but are not limited to;
 - a) Maintaining exhaust flows in accordance with good work practices; and
 - b) Minimizing furnace openings when not necessary for furnace operations. and
 - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

B. Process P002 (B): Argon-Oxygen Decarburization Vessel (AOD)

1. Restrictions:

- ~~a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)~~
- b. The permittee shall not conduct, or allow to be conducted, AOD process operations unless the pollution control system is on-line, properly maintained and operated according to the following conditions: (2102.04.b.5, 40 CFR §63.10686(b)(1), 25 Pa. Code §129.99)
 - 1) Emissions from the AOD during process operations shall be exhausted to baghouse C006; and
 - 2) The differential pressure across the baghouse shall not exceed 15 inches w.c.

~~2. Testing Requirements:~~

~~The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~

3. Monitoring Requirements:

- a. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system and baghouse C006 for the AOD. These inspections shall include observations of the physical appearance of the equipment. Any deficiencies shall be noted, and proper maintenance performed. (§2103.12.i, 2102.04.b.5, 25 Pa. Code §129.100)
- b. The permittee shall have instrumentation to continuously monitor the differential pressure drop across each compartment of the C006 Canopy baghouse during operation of the AOD. Said instrumentation shall be properly operated, calibrated and maintained according to manufacturer's specifications. (§2103.12.i, §2102.04.b.5, 25 Pa. Code §129.100)
- c. The permittee shall monitor production on a monthly and 12-month basis. (§2103.12.i, 2102.04.b.5, 25 Pa. Code §129.100)

4. Record Keeping Requirements:

- a. The permittee shall record and maintain the following data for the AOD and associated control equipment: (§2102.04.b.5, §2103.12.j, 40 CFR 63.10685, 25 Pa. Code §129.100)
 - 1) Monthly operational status inspections;
 - 2) Monthly and 12-month production for the AOD; and
 - 3) Records of operation, maintenance and inspections.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, §2103.12.h.1, 25 Pa. Code §129.100)

- c. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

5. Reporting Requirements:

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
 - 1) Monthly and 12-month data required to be recorded for Condition V.B.4.a above; and
 - 2) Non-compliance information required to be recorded by Condition V.B.4.b above.
- ~~b. Reporting instances of non-compliance in accordance, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above if appropriate. (§2103.12.k)~~

6. Work Practice Standards:

- a. The AOD shall be: (§2102.04.b.5, 25 Pa. Code §129.99, RACT Order No. 260, Condition 1.3)
 - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
 - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
 - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

C. Process P008 (W): No. 1 A & P HNO₃/HF Pickling Line and No.2 A & P HNO₃/HF Pickling Line (NO_x only)

1. Restrictions:

- ~~a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)~~
- b. The permittee shall at no time, conduct or allow to be conducted pickling operations in the No. 1 A & P HNO₃/HF Pickling Line, (including the associated Tubs Nos. 1 – 3) and No. 2 A and P Line HNO₃/HF Pickling, (including the associated Tubs Nos. 1 – 3) unless all emissions from HNO₃/HF pickling are directed to and processed through the wet chemical packed tower scrubber D-019 (scrubber). The scrubber shall be properly maintained and operated according to the following conditions: (§2102.04.b.5, Permit No. 0059-I002, Condition Nos. 26, 27 and 28, 25 Pa. Code §129.99)
- 1) The pH shall be between 8.0 and 12.5;
 - 2) The scrubbing solution shall be NaOH and NaHS in water;
 - 3) The minimum scrubbing liquid flow-rate shall be 250 gallons per minute;
 - 4) The maximum differential pressure drop across the scrubber shall be 7.0" w.c.
 - 5) The scrubber shall be equipped with instrumentation that shall continuously monitor pH, oxidation-reduction potential (ORP), scrubbing liquid flow-rate and differential pressure.
 - a) The permittee shall calibrate the pH and ORP meters on a weekly basis;
 - b) The permittee shall obtain the manufacturer's specifications for the flow meter and operate the flow meter within the percentage range or gallons per minute accuracy specified in said specifications.
 - c) The permittee shall obtain the manufacturer's specifications for the scrubber differential pressure (dp) gauge and operate the dp gauge within the percentage accuracy specified in said specifications.
- c. The throughput for No. 1 A & P HNO₃/HF Pickling Line shall not exceed 262,800 tons of steel in any consecutive twelve-month period. (§2102.04.b.5, 25 Pa. Code §129.99)
- d. The throughput for No. 2 A & P Line HNO₃/HF Pickling Line shall not exceed 148,920 tons of steel in any consecutive twelve-month period. (§2102.04.b.5, 25 Pa. Code §129.99)
- e. Emissions from No. 1 A & P Line HNO₃/HF Pickling Line and No. 2 A & P HNO₃/HF Pickling Line shall not exceed the emissions limitations in Table V-C-1 below. (§2102.04.b.5, 25 Pa. Code §129.99)

TABLE V-C-1: No. 1 A & P Line NO₃/HF Pickling Line and No. 2 A & P Line HNO₃/HF Pickling Line Emission Limitations

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
No. 1 A & P Line: NO _x	15.5	67.8
No. 2 A & P Line: NO _x	11.07	48.49

*A year is defined as any consecutive 12-month period.

2. Testing Requirements:

- a. The permittee shall perform a stack test on the scrubber to which No. 1 A & P HNO₃/HF Pickling Line and No. 2 A & P HNO₃/HF Pickling Line facilities exhaust (scrubber). The testing shall determine the NO_x emission rate from the scrubber. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02, 25 PA Code §129.100)
- ~~b. After the completion of the stack testing required by Condition V.C.2.a above, the permittee shall test the scrubber for PM, PM₁₀, PM_{2.5}, NO_x, HF, H₂SO₄, and HNO₃ at least once every five (5) years. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~
- ~~e. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~

3. Monitoring Requirements:

- a. The permittee shall inspect the subject scrubber D019, weekly to ensure compliance with Condition V.C.1.b above. (§2103.12.i, 25 Pa. Code §129.100)
- b. The packed bed scrubbers shall be provided with monitoring instrumentation that shall, continuously monitor the following parameters of the scrubbing liquid in the scrubber. The monitoring instrumentation shall be inspected for proper operation weekly. Calibration shall be conducted as required by manufacturer's instructions, unless specified more frequently elsewhere in this permit, to ensure accurate measurements of the following: (§2102.04.b.5, §2103.12.i, 25 Pa. Code §129.100)
 - 1) The pressure drop across the scrubber;
 - 2) The scrubbing liquid flow rate;
 - 3) The scrubbing liquid pH; and
 - 4) The scrubbing liquid ORP.
- c. The permittee shall perform daily visual inspection of emissions while the affected source is operating under normal conditions and weekly inspections of the scrubber for proper operation and to ensure that there is no evidence of chemical attack on its structural integrity. (§2102.04.b.5, §2103.12.i, 25 Pa. Code §129.100).
- d. The permittee shall monitor: (§2103.12.i, 25 Pa. Code §129.100)
 - 1) Steel throughput (monthly, and 12-month); and
 - 2) Operation, maintenance, inspection and calibration and/or replacement of process or pollution control equipment.

4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following data for the No. 1 A & P Line HNO₃/HF Pickling and No. 2 A & P Line HNO₃/HF Pickling. (§2102.04.b.5, §2103.12.j, Permit No. 0059-I002, Condition No. 29, 25 Pa. Code §129.100)
 - 1) The throughput in tons of steel (monthly and rolling 12-month);
 - 2) The scrubbing liquid flow-rate (daily average, monthly average, and 12-month rolling average);
 - 3) Differential pressure drop across the scrubber (daily average, monthly average and 12-month rolling average);
 - 4) Chemical usage (daily, monthly, and 12-month);
 - 5) Oxidation Reduction Potential (ORP) (daily average);
 - 6) pH (daily average);
 - 7) Weekly records of the ORP and pH monitoring instrumentation inspection results; and
 - 8) Records of operation, maintenance, inspection, calibration and/or replacement of process or control equipment.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.h.1, §2103.12.j, 25 Pa. Code §129.100)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

5. Reporting Requirements:

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
 - 1) Monthly and 12-month data required to be recorded by Condition V.C.4.a above; and
 - 2) Non-compliance information required to be recorded by Condition V.C.4.b above.
- ~~b. Reporting instances of non-compliance in accordance with Condition V.C.5.a above does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above, if appropriate. (§2103.12.k)~~

6. Work Practice Standards:

- a. The No. 1 A & P Line HNO₃/HF Pickling and No. 2 A & P Line HNO₃/HF Pickling shall be: (§2102.04.b.5, 25 Pa. Code §129.99, RACT Order No. 260, Condition 1.3)
 - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
 - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
 - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

D. Process P009 (CC): Lewis Temper Mill (VOCs only)

1. Restrictions:

- ~~a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)~~
- b. The production of the Lewis temper mill shall not exceed 219,000 tons of steel in any consecutive twelve-month period. (§2102.04.b.5, 25 Pa. Code §129.99)
- c. Maintain production and operating records in compliance with §1.9.A of Consent Decree No. 260 and §2105.06 of Article XXI. (§2105.06, Consent Decree No. 260, 25 Pa. Code §129.100)
- d. Fugitive emissions from the Lewis temper mill shall not exceed the emissions limitations in Table V-D-1 below. (§2102.04.b.5, 25 Pa. Code §129.99)

TABLE V-D-1: Lewis Temper Mill Emission Limitations

POLLUTANTS	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
Volatile Organic Compounds	3.50	15.30

* A year is defined as any consecutive 12-month period.

2. ~~Testing Requirements:~~

~~The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~

3. Monitoring Requirements:

- a. The permittee shall monitor production on a monthly total and a rolling 12-month total basis. (2103.12.i, 25 Pa. Code §129.100)
- b. The permittee shall monitor kerosene usage on a daily total monthly total and a rolling 12-month total basis. (2103.12.i, 25 Pa. Code §129.100)

4. Record Keeping Requirements:

- a. The permittee shall record and maintain the following data for Lewis temper mill: (§2102.04.b.5, §2103.12.j, 25 Pa. Code §129.100, RACT Order No. 260, Condition 1.9)
 - 1) Production (monthly total, and rolling 12-month total);
 - 2) Kerosene usage (daily total, monthly total, and rolling 12-month total); and
 - 3) Records of operation, maintenance, inspection and calibration and/or replacement of process equipment.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.h.1, §2103.12.j,

25 Pa. Code §129.100)

- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

5. Reporting Requirements:

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100,)
 - 1) Monthly total and rolling 12-month total data required to be recorded by Condition V.D.4.a above; and
 - 2) Non-compliance information required to be recorded by Condition V.D.4.b above.
- ~~b. Reporting instances of non-compliance in accordance with Condition V.D.5.a above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7 above, if appropriate. (§2103.12.k)~~

6. Work Practice Standards:

- a. The Lewis Temper Mill shall be: (§2102.04.b.5, 25 Pa. Code §129.99)
 - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
 - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
 - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

E. Process P011 (II): Miscellaneous Paints (VOCs only)

1. Restrictions:

- ~~a. The permittee shall continue to comply with all regulatory and Permit requirements. (2102.04.b.5)~~
- b. The permittee shall perform miscellaneous painting/coating activities utilizing paints/coatings with a maximum VOC content per gallon equal to or less than 7.0 pounds per gallon, less water and exempt solvents, after adjustment to a standard solvent density of 7.36 pounds per gallon and a solids basis. The 12-month rolling average of VOCs of all paint used for this purpose shall be no greater than 5.2 pounds per gallon, less water and exempt solvents, after adjustment to a standard solvent density of 7.36 pounds per gallon and a solids basis. (RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.99)
- c. Emissions from Miscellaneous Paints, based on an annual usage of 4,000 gallons per 12-month period, shall not exceed the emissions limitations in Table V-E-1 below (§2103.12.a.2.B, 25 Pa. Code §129.99)

TABLE V-E-1: Miscellaneous Paints Emission Limitations

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Volatile Organic Compounds	10.4

*A year is defined as any consecutive 12-month period.

~~2. Testing Requirements:~~

~~The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Site Level Condition IV.13 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)~~

3. Monitoring Requirements:

- a. The permittee shall monitor the following data for miscellaneous paints: (§2102.04.b.5, §2103.12.i, RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.100)
- 1) Quantity of paints/coatings used at the facility (monthly, 12-month);
 - 2) Density of paints/coatings used at the facility (monthly, 12-month);
 - 3) Water content of paints/coatings used at the facility (monthly, 12-month); and
 - 4) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).

4. Record Keeping Requirements:

- a. The permittee shall record the following data for miscellaneous paints: (§2102.04.b.5, §2103.12.j, RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.100)
- 1) Quantity of paints/coatings used at the facility (monthly, 12-month);
 - 2) Density of paints/coatings used at the facility (monthly, 12-month);

- 3) Water content of paints/coatings used at the facility (monthly, 12-month); and
 - 4) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).
- b. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

5. Reporting Requirements:

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
- 1) Quantity of paint and coatings used at the facility in gallons (monthly, 12-month); and
 - 2) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).

6. Work Practice Standards:

- a. The permittee shall apply paint and coatings in a manner that minimizes VOC emissions. (§2102.04.b.5, §2105.83.h, 25 Pa. Code §129.99)
- b. ~~This shall be accomplished by: (§2102.04.b.5, §2105.83.h, RACT Order No. 260, Condition 1.10)~~
- ~~1) Storing all VOC-containing industrial cleaning solvents and paints, paint brushes, used shop towels and related waste materials in closed and sealed containers;~~
 - ~~2) Ensuring that mixing and storage containers used for VOC-containing industrial cleaning solvents, paints and related waste materials are kept closed at all times except when depositing or removing these materials; and~~
 - ~~3) Minimizing spills of VOC-containing industrial cleaning solvents, paints and related waste materials and cleaning up spills immediately.~~

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