



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

June 25, 2007

Mr. Henry Malone
Environmental/Project Engineer
Smiths Medical ASD, Inc.
10 Bowman Drive
Keene, New Hampshire 03431

RE: Report for On-Site Full Compliance Evaluation

Dear Mr. Malone:

The New Hampshire Department of Environmental Services, Air Resources Division ("DES"), conducted an On-Site Full Compliance Evaluation of Smiths Medical ASD, Inc. ("Smiths") located on 25 Production Avenue in Keene, NH on June 4, 2007. Enclosed is a copy of the Evaluation Report for your records.

DES identified a number of deficiencies during the inspection, all of which are detailed in the enclosed report. The deficiencies include the following:

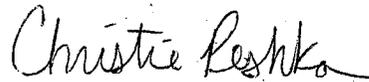
- Smiths submitted its emission-based fees for calendar years 2005 and 2006 after the respective deadlines for each year;
- Smiths is not submitting the monthly fuel usage and hours of operation for the each boiler in its Annual Emissions Reports;
- Smiths is not submitting its Semi-annual Excursion Reports, as required by Table 8, Item #6 of the Title V Operating Permit;
- Smiths submitted its Semi-annual Permit-Deviation and Monitoring Report on August 25, 2006, which was after the July 31, 2007 due date; and
- Smiths did not report its December 30, 2006 and January 1, 2007 permit deviations within 24-hours of the discovery of the occurrence.

Smiths must take the following corrective actions:

- Submit monthly fuel usage and hours of operation for each boiler in all future Annual Emissions Reports; and
- Submit all future Semi-annual Excursion Reports.

If you have any questions, please feel free to call me at (603) 271-0537.

Sincerely,



Christie Peshka
Compliance Assessment Specialist
Compliance Bureau
Air Resources Division

Enc.: Inspection Report

Cc: David Jankowski, Smiths Medical ASD, Inc.

**STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
AIR RESOURCES DIVISION**

**Full Compliance Evaluation Report
On-Site Visit**

**Smiths Medical ASD, Inc.
25 Production Avenue
Keene, New Hampshire 03431**

(603) 352-3812

Cheshire County

AFS #: 3300500043

Inspection Date: June 4, 2007

Report Drafted: June 5, 2007

Report Finalized: June 22, 2007

I. Inspection:

On June 4, 2007, the New Hampshire Department of Environmental Services (“DES”), Air Resources Division (“ARD”) conducted an Onsite Full Compliance Evaluation (“FCE”) of Smiths Medical ASC, Inc. (“Smiths”), located on 25 Production Avenue in Keene, NH. Smiths was targeted for inspection because it is a Title V facility and was last inspected in 2003. DES ARD conducted an off-site compliance evaluation in 2005 and no notable violations were found.

Date/Time of Inspection: June 4, 2007, 9:00 AM – 12:00 PM
Type of Inspection: Onsite Full Compliance Evaluation
Inspected by: Christie Peshka
Weather: Cloudy and ~65° F
Source Contact(s): Henry Malone, Environmental/Project Engineer
Bob Barlow, Senior Maintenance Engineer
Jeff Luebke, Sterilization Engineer

Observation upon approach to the facility: There were no visible emissions and there were no odors detected.

The purpose of the inspection was discussed and Mr. Malone agreed to the inspection, provided access to the facility, and provided all of the requested information. Mr. Malone stated that none of the information provided was confidential.

Smiths is a publicly held international company that employs 8 people in the 22,000 square foot sterilization portion of the building. Smiths also employs 26 people in the remaining 88,000 square foot warehouse portion of the building. The facility was built in 1986, when the company was operating under the name Portex, Inc. The sterilization process operates 24 hours per day, 6 days per week.

II. Process Description:

Smiths manufactures plastic products for medical and hospital use. These disposable medical devices are used for anesthesia, respiratory care, critical care, and infection control. The medical devices are manufactured and assembled at Smiths’ Bowman Drive facility, also located in Keene, NH. The completed products are packaged, sealed, and transported to the Production Avenue facility where they are placed in one of the 7 sterilization chambers to destroy any bacterial contaminants. The products go through an approximate 11 hour sterilization cycle using ethylene oxide (“EtO”). EtO is toxic and highly flammable. The sterilization chamber is evacuated to remove the oxygen and filled with nitrogen at a controlled humidity prior to introducing the EtO.

After sufficient time for sterilization to occur, the chamber goes through a number of evacuation and nitrogen purge cycles to remove the EtO. The Chemrox Deoxx Wet Scrubber (“Chemrox”) removes the EtO contained in the evacuated gas from the sterilization chamber. The Chemrox is required to have a removal efficiency of at least 99%. The sterilized products are then moved to one of 15 hot cells where they remain for approximately 24 hours and then to one of 4 quarantine rooms for at least 48 hours where they are allowed to off-gas any remaining EtO. The Dec-E-Tech

Catalytic Oxidizer ("Dec-E-Tech") destroys the EtO released from the hot cells and quarantine rooms. The Dec-E-Tech is required to have a destruction efficiency of at least 99% or limit the EtO emissions to 1 ppm, whichever is less stringent. After the sterilization process is complete, the products are placed into the warehouse until they are distributed to the customer.

Smiths has two small hot water boilers to supply hot water to the hot cell heat exchangers and two small boilers to supply steam to the sterilization chambers. The four boilers combust #2 fuel oil and are below DES ARD's permitting threshold, but emissions from the units are greater than 1,000 lb/yr combined, and therefore, are considered significant activities. The Dec-E-Tech combusts liquefied petroleum gas ("LPG").

Smiths is a major source of Hazardous Air Pollutant ("HAP") emissions and has been issued a Title V permit for the 7 EtO sterilizers, 13 EtO hot cells, 5 quarantine rooms, 2 hot water boilers, 2 steam boilers, and an emergency generator.

III. Observations:

After discussing safety issues for the facility, Mr. Malone, Mr. Barlow, and Mr. Luebkehan conducted a tour of the facility. During the inspection, Smiths was operating its sterilization process, one of its hot water boilers, and one of its steam boilers. I observed the liquefied EtO canister storage building, the EtO volatilization and distribution room, the pre-conditioning room, one of the sterilization chambers, one of the hot cell rooms, the quarantine room, the warehouse, the Chemrox, the Dec-E-Tech, and the four boilers.

Mr. Malone informed me that the emergency generator that is included in Smiths' Title V permit was removed on June 1, 2007. Mr. Malone stated that Smiths intends to install a different emergency generator in the near future. I informed Mr. Malone that, before the new emergency generator is installed, Smiths must submit an application for the new unit. Mr. Malone also explained that there is always one steam boiler and one hot water boiler operating 24 hours per day. He said that they are on an alternating schedule and each of the four units operates approximately 12 hours per day.

Mr. Malone also explained that the scrubber system is a closed loop and that none of the sulfuric acid that is added to the scrubber liquor to decrease its pH is emitted to the atmosphere. He also explained that the ethylene glycol produced by the reaction of scrubber liquor with EtO is sold to other businesses. Mr. Malone said that Smiths was able to achieve increased collection efficiency in the scrubber by changing the scrubber liquor more often. This increased efficiency was demonstrated during the 2006 stack test on the Chemrox.

Mr. Malone stated that the sterilizers will not function if the Chemrox is not operating. Mr. Malone also explained that when the Dec-E-Tech is not operating during periods of maintenance or malfunction, the ventilation system automatically shuts down and no emissions are released from the hot cell or quarantine rooms. Both of these safety features are designed to prevent the uncontrolled release of EtO to the environment.

IV. Compliance With Applicable Federal Rules (Env-A 500):

CHAPTER ENV-A 500 - Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants

Smiths is subject to Subpart O of the National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technology, or "MACT", Standards) specified in Env-A 505.01, because it uses over 10 tons per year of EtO in its process. Sources subject to a MACT standard are automatically required to obtain a Title V Operating Permit. See Section XII of this report for more details.

Smiths is not subject to any of the New Source Performance Standards ("NSPS") specified in Env-A 503.01 or the National Emission Standards for Hazardous Air Pollutants ("NESHAP") specified in Env-A 504.01.

V. Compliance With Permitting Requirements (Env-A 600):

CHAPTER Env-A 600 - Statewide Permit System

On August 2, 2004, DES ARD received a Title V Operating Permit Renewal Application from Smiths. On December 19, 2005, DES ARD issued Smiths the renewed Title V Permit TV-OP-028 (the Permit). The Permit was amended on March 2, 2006 and again on October 13, 2006, to incorporate changes in the Responsible Official and Technical Contacts. The Permit expires on December 31, 2010.

A. Operating Data

Operational information and permit limitations for the devices in the Permit are listed in Table I below.

Table I - Operating/Emission Limits and Reported Usage

Device	Operating Limits	Reported Usage
EU1: 7 EtO Sterilizers Units #1,#2,#3,#6, = 30.3 m ³ Unit #4 = 24.1 m ³ Unit #5 = 10.1 m ³ Exhaust from the EtO Sterilizers goes to the Chemrox Scrubber and then is released into the atmosphere	EtO Usage: 800 lbs/day Opacity: 20% Ethylene Glycol Content of Scrubber Liquor: ≤ 40%	EtO Usage: <u>2004:</u> 67.56 tons/yr (max 720 lbs/day) <u>2005:</u> 56.64 tons/yr (max 611 lbs/day) <u>2006:</u> 51.19 tons/yr (max 702 lbs/day) Ethylene Glycol Content: <u>2004:</u> 35.5 % max <u>2005:</u> 33.6 % max <u>2006:</u> 29.9 % max
EU2: 15 Hot Cells and 4 Quarantine Rooms Exhaust from the Hot Cells and Quarantine Rooms goes to the Dec-E-Tech Catalytic Oxidizer.	Opacity: 20% Dec-E-Tech Oxidation Temperature: no more than 10 °F below the baseline temperature of 353 °F	Dec-E-Tech Temperature: <u>2004:</u> 353.0 °F min <u>2005:</u> 353.9 °F min <u>2006:</u> 353.3 °F min

Device	Operating Limits	Reported Usage
EU3: Emergency Generator Manufacturer: Caterpillar Model #: 3306 Serial #: 9NR00930 Rating: 2.684 MMBtu/hr Fuel: #2 Fuel Oil Install Date: 1997 Status: Removed June 1, 2007	Hours: 500 hrs/yr Sulfur Content: 0.4% by weight for #2 fuel oil Opacity: 20%	Fuel Usage: <u>2004</u> : 0 gal/year <u>2005</u> : 0 gal/year <u>2006</u> : 0 gal/year <u>2007</u> : 0 gal/year, removed
EU4: (2) Hot Water Boilers Manufacturer: York Shipley Model #: SPWV-125-2 Serial #: 88-17151 & 88-17166 Rating: 4.184 MMBtu/hr Fuel: #2 Fuel Oil Install Date: 1988 Status: Operating	Sulfur Content: 0.4% by weight for #2 fuel oil Opacity: 20%	Fuel Usage: <u>2004</u> : 160,981 gal/year (combined) <u>2005</u> : 179,989 gal/year (combined) <u>2006</u> : 170,494 gal/year (combined)
EU5: (2) Steam Boilers Manufacturer: York Shipley Model #: SPHV-80-2 Serial #: 88-17210 & 88-17211 Rating: 2.678 MMBtu/hr Fuel: #2 Fuel Oil Install Date: 1988 Status: Operating	Sulfur Content: 0.4% by weight for #2 fuel oil Opacity: 20%	

B. Emissions

Smiths calculates its emissions using EPA's AP-42 Emission Factors, stack testing results, fuel usage, and EtO emissions data. The reported emissions for the permitted devices are listed in Table II below.

Table II – Reported Annual Emissions

Pollutant	Reported 2004	Reported 2005	Reported 2006
Nitrogen Oxide	2.20	2.36	2.28
Sulfur Dioxide	4.57	5.11	4.84
Carbon Monoxide	0.48	0.53	0.50
Particulate Matter	0.18	0.20	0.19
Volatile Organic Compounds (VOC)*	0.43	0.31	0.06
VOC Emissions from Fuel Combustion	0.04	0.04	0.04

* VOC emissions from EtO

Part Env-A 618- Sources Located in Non-Attainment Areas of the Northeast Ozone Transport Region

Smiths is located in Cheshire County of New Hampshire and is in the Northeast Ozone Transport

Region. Smiths is a major stationary source, but is not a new major source and has made no major modifications; therefore, this part is not applicable to Smiths.

VI. Compliance with Permit Fee System (Env-A 700):

CHAPTER ENV-A 700 - Permit Fee System

Smiths has paid emission-based fees for its permitted devices through calendar year 2005. On September 18, 2006, Smiths paid its emission-based fees for calendar year 2005, which were due on April 15, 2006. Smiths did not pay its emission-based fees for calendar year 2006 until June 18, 2006. The fees were due on April 15, 2007. **Smiths submitted its emission-based fees 181 days late for calendar year 2005 and 64 days late for calendar year 2006.**

During the inspection, Mr. Malone explained that the invoice to Smiths from DES ARD has been submitted to Smiths accounting section and was currently going through the payment system. He stated that Smiths requires an invoice in order to issue a check to DES ARD. I suggested that in the future, Smiths submits its Annual Emission Reports to DES ARD in January or February of the following calendar year, so that DES ARD can issue an invoice sooner and allow Smiths enough time to submit the payment to DES ARD by April 15th of that year. Smiths submitted its calendar year 2006 Annual Emissions report to DES ARD on April 3, 2007.

VII. CHAPTER Env-A 800 – Testing and Monitoring Procedures

Smiths performs and keeps records of all of its required preventative maintenance and inspections. Smiths has performed the necessary glycol analysis on the Chemrox and temperature monitoring on the Dec-E-Tech.

Part Env-A 806 – Sulfur Content Testing on Fuels

Smiths maintains documentation stating the weight percent of sulfur for each delivery of fuel oil. See Section XI of this report for more information.

VIII. Compliance with Recordkeeping and Reporting (Env-A 900):

CHAPTER Env-A 900 - Owner or Operator Recordkeeping and Reporting Obligations

Smiths is maintaining all of the records required by the Permit for a minimum of 5 years. The facility maintains operating logs, records on the process operations, records on the combustion devices, monitoring and testing documentation, inspection reports, and maintenance reports.

Smiths is submitting all of the information required by the Permit in its Annual Emissions Reports, Semi-Annual Reports, and EtO usage Reports, except for the monthly fuel usage and hours of operation of each of the four boilers (required in the Annual Emissions Report). **Smiths is not submitting monthly fuel usage or hours of operation for each boiler in its Annual Emissions Reports.** Mr. Malone stated that the boilers operate on a lead and lag system, and that each of the four boilers operate for approximately 12 hours per day, and that he would include the hours of

operation in all future Annual Emissions Reports.

Smiths is not submitting its Semi-annual Excursion Reports, as required by Table 8, Item #6 of the Permit. Mr. Malone stated that there were no excursions, so he thought the reports did not need to be submitted to DES ARD. I instructed Mr. Malone that even if there are no excursions, Smiths needs to submit the report stating that fact. Mr. Malone stated that he would submit these reports in the future. See Attachment I for a full list of reports submitted by Smiths and reviewed by DES ARD.

IX. Compliance with RACT:

Part Env-A 1204 - Stationary Sources of VOCs

The Chemrox and Dec-E-Tech reduce VOC emissions to less than 10 tons per year, therefore, Smiths is not subject to the requirements of this part.

Part Env-A 1211 - Nitrogen Oxides

According to the Permit, Smiths is exempt from NO_x RACT requirements of Env-A 1211.11 Emission Standards and Control Options for Emergency Generators, provided its operating hours are limited to less than 500 hours and its theoretical potential emissions of NO_x are less than 25 tons in any consecutive 12 month period. Smiths did not operate its emergency generator in the years covered in this report and removed the unit on June 1, 2007.

X. Compliance with Toxics Regulations (Env-A 1400):

CHAPTER ENV-A 1400 - Toxic Air Pollutants

On March 15, 2002, DES ARD conducted ambient air dispersion modeling for Smiths EtO emissions. The results showed that AAQS and ambient air limits ("AALs") could be met if Smiths limited its EtO usage to 800 lbs/day, maintained a 99% removal efficiency for the Chemrox, and maintained a 99% destruction efficiency or less than a 1 ppm EtO concentration at the outlet of the Dec-E-Tech.

Mr. Malone stated that he checks DES ARD's website approximately every 6 months to verify that the EtO limit has not changed and that Smiths is still in compliance with the AALs. EtO is the only regulated toxic air pollutant that is emitted during Smiths sterilization process. Smiths also has a computer system that continuously monitors the Chemrox operating parameters (scrubber liquor pH, temperature, and flow, and sterilization chamber exhaust rate) listed in Table 4, Items #5-#8 of the Permit. During the inspection, I reviewed portions of the data and it appeared to be in compliance with the permit limitations established during performance testing.

Fuel burning devices are exempt from an Env-A 1400 compliance review.

XI. Compliance with Fuel/Particulate/Opacity Regulations (Env-A 1600-2100):

CHAPTER ENV-A 1600 - Fuel Specifications

Smiths combusts #2 fuel oil delivered by Cheshire Oil in its boilers and generator. The facility maintains specification sheets from Sprague Energy, which state that the sulfur content of the fuel oil is less than 0.4% sulfur content by weight limit in the Permit.

Smiths combusts LPG delivered by Keene Gas in the burner of the Dec-E-Tech. The Permit limits the sulfur content of the LPG to 5 grains/100 ft³ in accordance with Env-A 402.03, which is approved in the State Implementation Plan ("SIP"). Effective May 29, 1997, Env-A 402.03 became Env-A 1605.01 and the maximum allowable sulfur content was increased to 15 grains/100 ft³. However, Env-A 1605.01 has never been approved in the SIP, and only SIP approved rules are used in the Title V Permits. Smiths reported that the sulfur content of the LPG used through calendar year 2006 contains a maximum of 10gr/100ft³, above the limit in the Permit, but below what is specified in Env-A 1605.01. DES ARD proposed an amendment to the permit, but it has not yet been approved by the EPA.

CHAPTER ENV-A 2000 - Fuel Burning Devices

Part Env-A 2002.02 – Visible Emission Standard for Fuel Burning Devices

The Dec-E-Tech, four boilers, and emergency generator have an opacity limit of 20% for any continuous 6 minute period. The Dec-E-Tech and two boilers were operating at the time of the inspection, and no visible emissions were observed.

Part Env-A 2002.08 – Particulate Emissions Standards for Fuel Burning Devices for Fuel Burning Devices Installed on or after January 1, 1985

Particulate matter emissions from Dec-E-Tech, four boilers, and emergency generator shall be limited to less than 0.30 lb/MMBtu. Compliance with emission standards can only be determined by stack testing, which has not been required for these devices at this time.

CHAPTER Env-A 2103 – Visible Emissions Standards

Env-A 2103.02 – Visible Emission Standards

The Chemrox is subject to this part. Smiths is aware that the opacity of process emissions shall not exceed 20 percent for any continuous 6-minute period. The unit was operating at the time of the inspection, and no visible emissions were observed.

XII. Compliance With Applicable Federal Rules:

40 CFR 63 Subpart O – Ethylene Oxide Emissions Standards for Sterilization Facilities

Smiths is required to sample and test the Chemrox scrubber liquor, on a weekly basis, for the

ethylene glycol concentration to confirm that the concentration is less than or equal to 40%. Smiths is also required to continuously monitor the scrubber liquor pH, scrubber liquor temperature, and scrubber liquor flow to the unit. The facility is continuously monitoring these parameters and is sending samples of the scrubber liquor to Aquarian Analytical on a weekly basis.

The facility is also required to continuously monitor and maintain the oxidation temperature of the Dec-E-Tech between 343°F and 353°F. Smiths is continuously monitoring the temperature and presented strip charts during the inspection that demonstrated compliance with this requirement. At the time of the inspection, the temperature was 367°F. Mr. Malone stated that if the temperature drops to below 343°F, the unit automatically shuts down and no emissions are vented from the hot cell or quarantine rooms. Smiths also replaces the top 3-6" of the catalyst bed in the Dec-E-Tech every other year and replaces the entire catalyst bed at least every 5 years. Smiths also sends out a core sample of the catalyst every year to test for activity, a measure of the removal efficiency or any contamination.

Subpart O also requires Smiths to maintain a minimum 99% destruction rate of the EtO emissions from the Chemrox and a minimum 99% destruction rate of the EtO emissions or outlet EtO concentration less than 1 ppm from the Dec-E-Tech. Compliance with these requirements was established during stack testing. See Section XIV of this report for more details.

40 CFR 63 Subpart A – NESHAP General Provisions

Smiths is keeping the required records for its continuous monitoring systems ("CMS") and is submitting its Semi-Annual Continuous Monitoring System Performance Evaluations and Excess Emissions Reports. There is one CMS for the Dec-E-Tech and one CMS for the Chemrox. Mr. Malone stated that the CMS are calibrated two times per year and that annual maintenance is conducted on the systems. Smiths maintains log books at the facility that document any maintenance, calibrations, or malfunctions for each of the CMS.

40 CFR 70.6(a)(3) - Monitoring and Related Recordkeeping and Reporting Requirements

Smiths is required to maintain and submit summary reports of stack testing conducted on the Chemrox and Dec-E-Tech, weekly EtO concentration of the scrubber liquor, daily average oxidation temperature for the Dec-E-Tech, sulfur content of fuel delivered to the facility, and a summary of startups, shutdowns, and malfunctions for the Chemrox and Dec-E-Tech. Smiths is reporting this information, along with any permit deviations, to DES ARD on a semi-annual basis, as required by Table 8, Item #5 of the Permit. **Smiths submitted its Semi-Annual Permit-Deviation and Monitoring Report on August 25, 2006, which was after the July 31, 2007 due date.**

Smiths is also required to report any permit deviations to DES ARD within 24-hours of the discovery of an occurrence. Smiths had permit deviations related to its CMS on December 30, 2006 and January 1, 2007, but did not report the deviations to DES ARD until January 22, 2007. **Smiths did not report the permit deviations within 24-hours of the discovery of the occurrence.** The permit deviations did not result in excess emissions.

Smiths is also maintaining all monitoring data, recordkeeping and reporting records, and support information for a period of at least 5 years.

40 CFR 70.6(c)(1) - Compliance requirements

Smiths has submitted its Annual Compliance Certifications to DES ARD through calendar year 2006. Smiths also includes a certification of accuracy statement with every report it submits to DES ARD.

XIII. Control Equipment:

As mentioned earlier in this report, the facility uses a Chemrox and a Dec-E-Tech to reduce the EtO emissions from the sterilization process.

XIV. Source Testing and Monitoring:

On September 26 and 27, 2006, stack testing was conducted on the Chemrox and the Dec-E-Tech. The test results for both devices showed that the EtO destruction efficiency limits in the Permit are being met.

XV. Enforcement History and Status:

DES ARD has no ongoing enforcement actions against Smiths.

XVI. Conclusion:

During the closing meeting, I indicated that no significant recordkeeping problems were noted and the records appeared to be in order. The following issues were discussed:

- Smiths submitted its emission-based fees for calendar years 2005 and 2006 after the respective deadlines for each year;
- Smiths is not submitting the monthly fuel usage and hours of operation for the each boiler in its Annual Emissions Reports;
- Smiths is not submitting its Semi-annual Excursion Reports, as required by Table 8, Item #6 of the Permit;
- Smiths submitted its Semi-annual Permit-Deviation and Monitoring Report on August 25, 2006, which was after the July 31, 2007 due date; and
- Smiths did not report its December 30, 2006 and January 1, 2007 permit deviations within 24-hours of the discovery of the occurrence.

Smiths Medical ASD, Inc.
Inspection Date: June 4, 2007

Smiths must take the following corrective actions:

- Submit monthly fuel usage and hours of operation for each boiler in all future Annual Emissions Reports; and
- Begin to submit its Semi-annual Excursion Reports.

XVII. Attachments:

- I. 07-0604 Smiths Medical ASD, Inc. FCE Records Review Checksheet



Christie Peshka
Compliance Assessment Specialist
Air Resources Division

Attachment I - Full Compliance Evaluation Records Review

Facility: Smiths Medical ASD, Inc.

Date of FCE: June 4, 2007

Reviewer: Christie Peshka

Annual Emission Reports (incl. NOx, VOC etc.) and EtO Usage Reports:

Reporting Period	When Rec'd?	When Due?	Reports OK?	In Database?
2004	04/15/2005	04/15/2005	No, See VIII	Yes
2005	04/13/2006	04/15/2006	No, See VIII	Yes
2006	04/03/2007	04/15/2007	No, See VIII	Yes

Annual Emissions-Based Fee Payments:

Reporting Period	When Rec'd?	When Due?	In Database?
2004	07/11/2005	04/15/2005	Yes, Sonny's spreadsheet
2005	09/18/2006	04/15/2006	Yes, Sonny's spreadsheet
2006	06/18/2007	04/15/2007	Yes, Sonny's spreadsheet

TV Annual Compliance Certifications:

Reporting Period	When Rec'd?	When Due?	Report OK?	In Database?
2004	04/15/2005	04/15/2005	Yes	Yes
2005	04/13/2006	04/15/2006	Yes	Yes
2006	04/03/2007	04/15/2007	Yes	Yes

Semi-Annual Permit Deviation and Monitoring Reports:

Reporting Period	When Rec'd?	When Due?	Report OK?	In Database?
2005 (1 st half)	07/25/2005	07/31/2005	Yes	Yes
2005 (2 nd half)	01/27/2006	01/31/2006	Yes	Yes
2006 (1 st half)	08/25/2006	07/31/2006	Yes	Yes
2006 (2 nd half)	01/31/2007	01/31/2007	Yes	Yes

Semi-Annual Continuous Monitoring Systems Performance Evaluations and Excess Emissions:

Reporting Period	When Rec'd?	When Due?	Report OK?	In Database?
2005 (1 st half)	07/25/2006	07/31/2005	Yes	Yes
2005 (2 nd half)	01/27/2006	01/31/2006	Yes	Yes
2006 (1 st half)	8/25/2007	07/31/2006	Yes	Yes
2006 (2 nd half)	01/31/2007	01/31/2007	Yes	Yes

Semi-Annual Excursion Summary Report:

Reporting Period	When Rec'd?	When Due?	Report OK?	In Database?
2006 (1 st half)	Not submitted	07/31/2006	N/A	N/A
2006 (2 nd half)	Not submitted	01/31/2007	N/A	N/A

Individual Permit Deviations Reports:

Reporting Period	When Rec'd?	When Due?	Deviation Type	In Database?
12/30/2006	01/22/2007	12/31/2007	CMS failure	Yes
01/01/2007	01/22/2007	01/02/2007	CMS failure	Yes

Stack Tests:

Stack Test Date	Device Tested	Report OK?	In Database?
08/01/2005	Dec-E-Tech	Yes	Yes
09/26/2006	Dec-E-Tech	Yes	Yes
09/27/2006	Chemrox	Yes	Yes