Martin Electronics, Inc.
Perry Facility

Facility ID No.: 1230047
Taylor County

Renewal Title V Air Operation Permit
FINAL Permit No.: 1230047-003-AV

Permitting Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B-200
Jacksonville, Florida 32256-7590
Telephone: 904/448-4310
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Renewal Title V Air Operation Permit
FINAL Permit No.: 1230047-003-AV

Table of Contents

Section **Page Number**

Placard Page 1

I. Facility Information 2-3

A. Facility Description.
B. Summary of Emissions Unit ID No(s). and Brief Description(s).
C. Relevant Documents.

II. Facility-wide Conditions .....4 - 6

III. Emissions Unit(s) and Conditions

A. Open Burn Unit 7
B. Martin Electronics Facility-wide Operations 8
C. 40 CFR 61: Subpart E.....9
D. 40 CFR 61: General Provisions.....13

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Secretary

Permittee:
Martin Electronics, Inc.
Perry Facility

FINAL Permit No.: 1230047-003-AV
Facility ID No.: 1230047
SIC Nos.: 34
Project: Renewal Title V Air Operation Permit

The purpose of this permit is to renew the Title V Air Operation Permit. This facility is located at SR 361A, 12 miles SW of Perry, Taylor County, Florida; UTM Coordinates: Zone 17, 243.3 km East and 3318.3 km North; Latitude: 29° 58′ 13″ North and Longitude: 83° 39′ 37″ West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix U-1, List of Unregulated Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06
Appendix CP, Compliance Plan
Alternate Sampling Procedure For Mercury: Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.

Effective Date: March 5, 2007
Renewal Application Due Date: September 6, 2011
Expiration Date: March 5, 2012

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK: lm

Section I. Facility Information

Subsection A. Facility Description.

Martin Electronics, Inc. is a small to medium size explosive and pyrotechnic device manufacturer. Facility processes include Raw Material/Product Storage, Production, Plating Operations, Test Facilities, Thermal Treatment, and Fuel storage.

Martin Electronics has various production lines located throughout the plant. Each of the products manufactured by the plant is done so through a dedicated production line. The production of pyrotechnics generally consists of blending, forming, packaging/encasing, and shipment preparation.

Hand grenade fuse parts are produced through the following processes: captive zinc die casting, vibratory deburring, noncyanide alkaline zinc electroplating and noncyanide chromate conversion coating operations. These processes are conducted on an intermittent basis, dependent upon contract requirements and schedules. The chromate conversion coating and zinc electroplating waste streams are individually chemically treated in the Industrial Wastewater Treatment Plant. Testing facilities are used to verify that the products manufactured meet contract specification.

The Open Burn Unit consists of a single unit limerock pad, which includes four diked concrete containment pads. Pans are used on each containment pad. The Open burn Unit receives all waste residues, pyrotechnic powders, contaminated containers, and waste industrial materials contaminated with pyrotechnic powders, metal bearing pyrotechnic powders and solvent (Acetone) contaminated pyrotechnic powders. The Open Burn Unit shall be operated in accordance with the RCRA operation permit.

Based on the Renewal Title V permit application received **September 8, 2005,** this facility is a major source of hazardous air pollutants (HAPs) and Volatile Organic Compounds (VOCs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
-001*	Open Burn Unit
-002*	Martin Electronics Facility-wide Operations
-003	Sludge Dryer

* See Appendix U-1, List of Unregulated Emissions Units and/or Activities

Subsection C. Relevant Documents

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

<u>These documents are provided to the permittee for information purposes only:</u>
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Statement of Basis

<u>These documents are on file with permitting authority:</u>
Application for Title V Air Operation Permit Renewal received 09/08/05
RCRA Permit 16099-008-HO

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

Documents on file with USEPA
Risk Management Plan submitted to the RMP Reporting Center on 04/01/99 (postmark date).

4. Prevention of Accidental Releases (Section 112(r) of CAA).
a. As required by Section 112(r)(7)(B)(iii) of the CAA and 40 CFR 68, the owner or operator shall submit an updated Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center.
b. As required under Section 252.941(1)(c), F.S., the owner or operator shall report to the appropriate representative of the Department of Community Affairs (DCA), as established by department rule, within one working day of discovery of an accidental release of a regulated substance from the stationary source, if the owner or operator is required to report the release to the United States Environmental Protection Agency under Section 112(r)(6) of the CAA.
c. The owner or operator shall submit the required annual registration fee to the DCA on or before April 1, in accordance with Part IV, Chapter 252, F.S., and Rule 9G-21, F.A.C.

Any required written reports, notifications, certifications, and data required to be sent to the DCA, should be sent to:

Department of Community Affairs
Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100
Telephone: 850/413-9921, Fax: 850/488-1739

Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

Any required reports to be sent to the National Response Center, should be sent to:
National Response Center
EPA Office of Solid Waste and Emergency Response
USEPA (5305 W)
401 M Street, SW
Washington, D.C. 20460
Telephone: 1/800/424-8802

Send the required annual registration fee using approved forms made payable to:
Cashier
Department of Community Affairs
State Emergency Response Commission
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2149

[Part IV, Chapter 252, F.S.; and, Rule 9G-21, F.A.C.]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit.
[Rule 62-213.440(1), F.A.C.]

6. [Not federally enforceable.] General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C]

7. [Not federally enforceable.] Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- Maintenance and washing of paved areas as needed.
- Limiting access to plant property by unauthorized vehicles.
- Sweeping of storage areas as needed.
- General housekeeping measures.
- Full enclosure of Sludge Dryer (located in the Industrial Waste Water Treatment Plant).

[Rule 62-296.320(4)(c)2., F.A.C.; Stated by applicant in the renewal Title V permit application received September 12, 2000]

{Note: This condition implements the requirements of Rules 62-296.320(4)(c)1., 3., & 4. F.A.C. (condition 57. of APPENDIX TV-6, TITLE V CONDITIONS.}"

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C]

9. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northeast District Office:

Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-75990
Telephone: 904/448-4310, Fax: 904/448-4363

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155, Fax: 404/562-9163 or 404/562-9164

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emission Unit(s) and Conditions

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-001	Open Burn Unit

Emission Unit 001 identifies the Open Burn Unit (unregulated Emissions Unit). The Open burn Unit receives all reactive pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts and contaminated industrial materials (hazardous waste code D003). The pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts may also carry hazardous waste codes D005 (Barium), D006 (Cadmium), D007 (Chromium) and D008 (Lead). The contaminated industrial materials may also carry hazardous waste codes D005, D006, D007, D008, F002, F003 and F005. The Open Burn Unit shall be operated in accordance with the RCRA operation permit.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum thermal treatment charge rate shall not exceed 500 pounds of hazardous waste per day. The amounts/quantity listed as the maximum burn batch size in Sub attachment II.0.3-1(1) of the Hazardous Waste Permit application shall not be exceeded for any of the waste streams.
[RCRA Permit 16099-008-HO]

A.2. Method of Operation. The hazardous waste facility will be operated for the thermal treatment of reactive pyrotechnic powder/composite cuttings, shavings, residues, slurries, and unacceptable parts and contaminated industrial materials (hazardous waste code D003). The pyrotechnic powder/composite cuttings, shavings, residues slurries, and unacceptable parts may also carry hazardous waste codes D005, D006, D007, and D008. The contaminated industrial materials may also carry hazardous waste codes D005, D006, D007, F002, F003, and F005.
[RCRA Permit 16099-008-HO]

A.3. Hours of Operation. The hours of operation for this emissions unit shall occur only between 8:00 A.M. and 5:00 P.M., Monday through Friday (**2160 hours/year**).
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; [RCRA Permit 16099-006-HO]

A.4. Annual Operating Report. Total HAP emissions and total VOC emissions in tons shall be recorded monthly and reported annually.
[Rule 62-210.370(3), F.A.C.]

Section III. Emission Unit and Conditions

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
-002	Martin Electronics Facility -wide Operations

Emission Unit 002 identifies the various operations at the facility (Raw Material/Product Storage, Production, Plating Operations, Test Facilities, Thermal Treatment - Open Burn Unit, and Fuel storage).

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

B.1. Hours of Operation. The hours of operation for these emissions units shall not exceed 16 hours/day, 5 days/week, 48 weeks/year **3840 hours/year**.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Stated by applicant in the renewal Title V permit application received September 8, 2005]

Recordkeeping and Reporting Requirements

B.2. The permittee shall submit a Statement of Compliance with all terms and conditions of the permit. {See condition 51, APPENDIX TV-6, TITLE V CONDITIONS}.
[Rule 62-213.440(3), F.A.C.].

Subsection C. 40 CFR 61: Subpart E Requirements

E.U. ID No.	Brief Description
-003	Sludge Dryer

C.0. The permittee shall comply with the following requirements of 40 CFR 61 Subpart E, National Emission Standard for Mercury.
[40 CFR 61.50]

The following specific conditions apply to the emissions unit listed above:

Emission Standard

C.1. Emissions to the atmosphere from sludge incineration plants, sludge drying plants, or a combination of these that process wastewater treatment plant sludges shall not exceed 3.2 kg (7.1 lb) of mercury per 24-hour period.
[40 CFR 61.52(b)]

Stack Sampling

C.2. Unless a waiver of emission testing is obtained under 40 CFR 61.13, each owner or operator of a source subject to the standard in **Specific Condition C.1.** shall test emissions from that source. Such tests shall be conducted in accordance with the procedures set forth in 61.53(d) or in 61.54 and test Method 105 but modified as described in Alternate Sampling Procedure For Mercury: Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics as approved by EPA on November 1, 2006.

[40 CFR 61.53(d)(1) and Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

C.3. Method 101A in appendix B to this part shall be used to test emissions as follows:

(i) The test shall be performed within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date.

(ii) The test shall be performed within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.

[40 CFR 61.53(d)(2)]

C.4. Sludge Sampling. As an alternative means for demonstrating compliance with **Specific Condition C.1.,** an owner or operator may use Method 105 of 40 CFR 61 Appendix B, but modified as described in Alternate Sampling Procedure For Mercury: Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics as approved by EPA on November 1, 2006 and the procedures specified in this section.

(1)A sludge test shall be conducted within 90 days of the effective date of these regulations in the case of an existing source or a new source which has an initial startup date preceding the effective date, or;

(2)A sludge test shall be conducted within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.

[40 CFR 61.54(a) and Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

C.5. The Department shall be notified in writing at least 30 days prior to an emission test, so that he may at his option observe the test.
[40 CFR 61.54(b)]

{Permitting Note: if MEI demonstrates compliance with Specific Condition C.1 in accordance with the procedures set forth in 40 CFR 61.53(d), then the rule citation shall be 40 CFR 61.53(d)(3).}

C.6. Sludge Sampling. Sludge shall be sampled according to paragraph 40 CFR 61.54(c)(1) or Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006; sludge charging rate for the plant and the sludge analysis shall be performed according to **Specific Conditions C.7 through C.13.** Samples shall not be exposed to any condition that may result in mercury contamination or loss.

[40 CFR 61.54(c)(1) or Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006]

C.7. Number of Samples: Three time-composite samples will be collected from the conveyor belt subsequent to dewatering and before drying as specified in 40 CFR Part 61.54(c)(1); however, these samples will be collected in three consecutive loads of the dewatering/drying process within a period of 14-days after the first grab sample is obtained.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006]

C.8. Composite Sample: Each composite sample will be approximately two (2) liters in volume, represents approximately 5% of the total sludge volume processed in each load. A total of ten (10) grab samples of wet sludge (filter cake), each with approximately 200 ml in volume, will be collected at 30-minute intervals over a 5- hour period from the conveyor belt before reaching the heating elements. The collected grab samples will be contained in a 5-gallon plastic container (with a lid) until the sampling is complete.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006]

C.9. Sludge Mixing: Since each load of the sludge is generated from one, or at the maximum, two batches of wastewater (which is complete mixed during treatment), sludge characteristics within each half of a load are expected to be homogeneous and representative of the entire portions of the first and the second batches, respectively, of the sludge. With this understanding, a less amount of mixing than specified in Section 8.2 of Method 105 Procedures is proposed. The entire 2-liter sample will be mixed for 15 minutes in the 5-gallon container with a screwed type mixing rod through the lid and powered by a power drill. Confirm that the sample is visually homogeneous (otherwise perform more mixing) then equally divide it into four portions. Collect 40 ml sample from each portion, hand mix into one sample and place into an 8 oz. jar.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006]

C.10. Sample Holding Time: Immediately upon completion of the mixing, sample will be hand delivered to a National Environmental Laboratory Accreditation Conference (NELAC) certified laboratory for analysis on the same day or as soon as possible. Each determination shall be reported to the Department by a registered letter dispatched within 15 calendar days following the date such determination is completed.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006]

C.11. Sample Analysis: The sample will be analyzed for percent moisture content using ASTM Method D2216 and total mercury concentration using USEPA Method 7471B.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

C.12. Quality Assurance and Quality Control (QA/QC) Procedures: The QA/QC procedures associated with this monitoring will be performed in accordance with the requirements specified in Chapter 62-160, Florida Administrative code (F.A.C.).
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

C.13. Data Processing Procedures: The analytical results obtained from the MEI sludge sampling will be processes to simulate the potential mercury emission at the maximum capacity of 10 cubic feet (318 Kg, at a sludge weight of 70 pounds per cubic feet, or a specific weight of 1.12) of dewatered sludge per batch (6 hours) and a 24-hour continuous operation. This is equivalent to a maximum sludge processing capacity of 1,270 Kg/day. Assuming that 100% of the mercury in sludge is escaped in emissions during drying, the emissions potential will be calculated using the following equation:

$$E_{Hg} = M\ Q\ F / 1000$$

Where:

E_{Hg}= Mercury emissions, g/day.

M= Mercury concentration of sludge on a dry solids basis, mg/Kg.

Q= Actual sludge charging rate (Kg/day) or 1,270 Kg/day, whichever is greater.

F= Weight fraction of solids in the collected sludge sample after mixing.
[Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

C.14. No changes in the operation of a plant shall be made after a sludge test has been conducted which would potentially increase emissions above the level determined by the most recent sludge test, until the new emission level has been estimated by calculation and the results reported to the Department. [40 CFR 61.54(e)]

{Permitting Note: if MEI demonstrates compliance with Specific Condition C.1 in accordance with the procedures set forth in 40 CFR 61.53(d), then the rule citation shall be 40 CFR 61.53(d)(4).}

C.15. Records of sludge sampling, charging rate determination and other data needed to determine mercury content of wastewater treatment plant sludges shall be retained at the source and made available, for inspection by the Administrator, for a minimum of 2 years.
[40 CFR 61.54(g)]

{Permitting Note: if MEI demonstrates compliance with Specific Condition C.1 in accordance with the procedures set forth in 40 CFR 61.53(d), then the rule citation shall be 40 CFR 61.53(d)(6).}

Monitoring of emissions and operations

C.16. All the sources for which mercury emissions exceed 1.6 kg (3.5 lb) per 24-hour period, demonstrated either by stack sampling according to Sec. 61.53 or sludge sampling according to Sec. 61.54, shall monitor mercury emissions at intervals of at least once per year by use of Method 105 of Appendix B or the procedures specified in Sec. 61.53(d) (2) and (4). The results of monitoring shall be reported and retained according to Sec. 61.53(d)(5) and (6) or Sec. 61.54(f) and (g).
[40 CFR 61.55(a)]

C.17. Data Interpretation: If the proposed sampling and testing protocol results in potential mercury emissions greater than 25% of the mercury emission standard, it will be deemed inadequate and testing will be repeated following the procedures specified in Subpart E or an alternate approved procedure. [Proposed Mercury Monitoring Protocol For Sludge Dryer Martin Electronics, dated September 26, 2006 with analysis to be performed by EPA Method 7471B as approved by EPA on November 1, 2006.]

Subsection D. NESHAPs General Provisions.

E.U. ID No.	Brief Description
-003	Sludge Dryer

D.0. The permittee shall comply with the following requirements of 40 CFR Part 61, Subpart A when they are subject to an individual MACT requirement in Subsection C. In the event that the emission unit is no longer subject to the MACT requirement, they are also not subject to this Subsection.

The following conditions apply to the NESHAPs emissions units listed above:

40 CFR 61, Subpart A - General Provisions Requirements (Attached)