

ADEQ MINOR SOURCE AIR PERMIT

Permit #: 345-AR-2

IS ISSUED TO:

International Paper Russellville Container
3900 International Paper Drive
Russellville, AR 72802
Pope County
CSN: 580047

THIS PERMIT IS YOUR AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND YOUR APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 ET SEQ.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date

SECTION I: FACILITY INFORMATION

PERMITTEE: International Paper Russellville Container
CSN: 580047
PERMIT NUMBER: 345-AR-2

FACILITY ADDRESS: 3900 International Paper Drive
Russellville, AR 72802

COUNTY: Pope

CONTACT POSITION: Jeffery Reece, Process Improvement Manager
TELEPHONE NUMBER: 501-964-2258

REVIEWING ENGINEER: Shane Byrum

UTM North-South: 3,899,500 m
UTM East-West: 486,000 m

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

SECTION II: INTRODUCTION

Summary

International Paper Container Division (IP Russellville), located in Russellville (Pope County), Arkansas, manufactures corrugated containers from liner board paper. IP Russellville originally operated under Air Permit 345-AR-1. In December 1997, IP Russellville submitted an Air Pollution Prevention Plan (APPP). Because Regulation 18 and 19 (effective February 15, 1999) were modified and no longer include provisions for APPPs, this permit is necessary.

This permit limits the annual emissions of VOC and HAPs to levels below the major source thresholds, therefore, this facility is classified as a minor source. This facility is subject to 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry. However, the emission limits in this permit serve to limit the facility's emissions to levels below the major source threshold for VOC and Hazardous Air Pollutant (HAP) emissions, thereby exempting IP Russellville from the control requirements of the standard (pursuant to 40 CFR Part 63.820(a)(2) and (a)(3) of the standard).

Process Description

Rolled liner board paper stock is threaded onto the corrugator where it is shaped into small folds and glue is applied to both sides of the corrugated paper. Starch, water, Borax, caustic soda, and resin adhesive are combined in a batch process to mix the glue. Starch, which is unloaded from trucks into the starch silo, is transported to a hopper, which feeds the glue mix tank. Particulate emissions from the starch silo are controlled by a baghouse (SN-03). Emissions from the use of resin adhesive in the glue are released to the atmosphere via general building ventilation (SN-05). After glue is applied to the corrugated paper sheet, top and bottom layers of flat liner board paper are attached. As the sheet leaves the corrugator, it is cut to the appropriate size prior to further processing at the converters.

Steam is provided to various areas of the plant by a 20.9 MMBtu/hr natural gas fired boiler (SN-01). Diesel fuel can also be used to fire the boiler; however, this option is exercised only in the event of a natural gas curtailment or other emergencies. The diesel storage tank is vented to the atmosphere (SN-04).

Corrugated box board stock is process through to the converters where the stock is cut and finished to meet customer specifications. Die-cutters cut the stock to the correct dimensions and shape. Trim from this process, corrugator side trim, and corrugated hogged waste are conveyed to shredder-bailers where the waste is shredded and bailed. Particulate emissions generated from this process are controlled by the combination cyclone/baghouses (SN-06 A and B) located on the roof of the facility. The cyclones have baghouses on top and have a diverter to switch

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

between inside and outside venting; however, for this application the particulate emissions were calculated for outside venting. Presses along the converter line form creases on the flat container to allow for easy assembly, and ink presses print the required customer information with water-based ink. The converting process is completely enclosed within the building and no vents are associated with it. However, non-point source VOC and HAP emissions occur as a result of the ink, ink refresher, and glue used in finishing the flat container. These emissions are released to the atmosphere via general building ventilation (SN-05). From the converters, the flat containers are packaged and then shipped to the customer.

Regulations

The boiler is not subject to NSPS Subpart Dc because the boiler was installed before June 9, 1989. This facility is subject to *National Emission Standards for Hazardous Air Pollutants* (NESHAP) of 40 CFR Part 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry. However, the emission limits contained within this permit serve to limit the source's potential to emit to levels below the major source threshold. Therefore, IP Russellville is subject only to the record keeping and reporting provisions of the standard. This facility is also subject to regulations under the *Arkansas Air Pollution Control Code* (Regulation 18) and *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19).

The following table is a summary of the facility's total emissions.

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
PM	4.9	21.2
PM ₁₀	4.9	21.2
SO ₂	8.7	38.2
VOC*	0.5	93.9
CO	0.8	3.6
NO _x	3.1	13.6
Methane	0.06	0.3
Nitrous Oxide	0.02	0.1
Sulfur Trioxide	0.2	0.9
Ammonia	*	8.41
Formaldehyde #	*	7.23

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

TOTAL ALLOWABLE EMISSIONS		
Pollutant	Emission Rates	
	lb/hr	tpy
Glycol Ethers #	*	7.49
MIBK #	*	9.49
Vinyl Acetate #	*	9.49

- Denotes all HAPs

*-Hourly emissions do not reflect total emissions because hourly emissions were not calculated for SN-05 because it is an area source (emissions within the building).

Note - The total yearly HAP emissions at this facility may not exceed 23.0 tpy.

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

SECTION III: PERMIT HISTORY

Permit 345-A was issued to International Paper Russellville Container on 8/19/76.

Permit 345-AR-1 was issued to International Paper Russellville Container on 12/13/95. This permit updated the initial permit to the current regulations. This permit included allowable emission rates for each source for the first time, along with specific conditions. This permit modification reflected future planned modifications throughout the plant which allowed for increased production capability, increased hours of operation, and increased emissions that occurred due to these modifications.

In December of 1997, IP Russellville submitted an Air Pollution Prevention Plan (APPP) and operated under this until the issuance of this permit.

SECTION IV: EMISSION UNIT INFORMATION

Specific Conditions

- Pursuant to §19.501 et seq of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control, effective February 15, 1999 (Regulation 19) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. These emission rates for SN-01, SN-03, SN-04, and SN-06 are based on current maximum physical capacity of the equipment with year round continuous operation at this maximum rate, therefore no compliance demonstration is necessary for these sources. Compliance at SN-05 will be demonstrated by Specific Condition 7.

SN	Description	Pollutant	lb/hr	tpy
01	Boiler (20.922 MMBtu/hr)	PM ₁₀	0.4	1.8
		SO ₂	8.7	38.2
		VOC	0.1	0.5
		CO	0.8	3.6
		NO _x	3.1	13.6
02	Corrugator Exhaust Fans	Emissions included in SN-05		
03	Starch Silo	PM ₁₀	0.1	0.5
04	Diesel Fuel Storage Tank	VOC	0.4	0.1
05	General Building Ventilation	VOC	--	93.3
06	Cyclones	PM ₁₀	4.4	18.9

- Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table.

SN	Description	Pollutant	lb/hr	tpy
01	Boiler	PM	0.4	1.8
		CH ₄	0.06	0.3

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

SN	Description	Pollutant	lb/hr	tpy
		N ₂ O	0.02	0.1
		SO ₃	0.2	0.9
03	Starch Silo	PM	0.1	0.5
05	General Building Ventilation	Ammonia Formaldehyde Glycol Ethers MIBK Vinyl Acetate	-----	8.41 7.23 7.49 9.49 9.49
06	Cyclones	PM	4.4	18.9

3. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not emit more than 23.0 tons per year of total HAPs.
4. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions shall not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. Compliance for opacity limit for SN-01, SN-03, and SN-06 will be demonstrated by annual inspection.

SN	Limit	Regulatory Citation
01	5% (firing natural gas) 20% (firing diesel fuel)	Reg. 18.501 Reg. 19.503
03	5%	Reg. 18.501
06	20%	Reg. 19.503

5. Pursuant to §18.801 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

6. Pursuant to §18.901 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne.
7. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with SN-05 emission rate in Specific Condition 1, including the mass of all VOC containing materials used and the mass fraction of VOC present in each VOC containing material used, on a rolling twelve month total. The permittee shall use a format similar to the following table to maintain records of each VOC used during each calendar month. The total allowable limit for annual VOC emissions at SN-05 is 93.3 tons per year.

Material	Material Density (lb/gal)	VOC Weight Fraction	Gallons used this month (gallons)	VOC Emissions this month (lbs/month)
(a)	(b)	(c)	(d)	(c)=b x c x d

8. Pursuant to §18.1004 of Regulation 18, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with SN-05 tons per year emission rates in Specific Condition 2, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a rolling twelve month total. The permittee shall use a format similar to the following table to maintain records of each HAP used during each calendar month. The total allowable limit for annual total HAPs is 23 tons per year.

Material	HAP	Material Density (lb/gal)	HAP Weight Fraction	Gallons of material used this month (gallons)	HAP Emissions this month (lbs/month)
(a)	(b)	(c)	(d)	(e)	(f)=c x d x e

9. Pursuant to §19.705 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain monthly records which demonstrate compliance with Specific Conditions 7 and 8. Records shall be updated by the last day of the month following the month to which the records pertain. These records shall be kept on site, and shall be made available to Department personnel upon request. A twelve month rolling average and each individual month's data shall be submitted in accordance with General Condition 6.

NESHAP Requirements

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

10. Pursuant to 40 CFR Part 63, Subpart KK - National Emissions Standards for the Printing and Publishing Industry, the permittee chooses to commit to and meets the following criteria stated in 40 CFR 63.820, paragraph (a)(2).

40 CFR 63.820 Applicability

(a) The provisions of this subpart apply to:

(2) each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of this section for purposes of establishing the facility to be an area source with respect to this subpart:

(i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including material used for source categories or purposes other than printing and publishing, and

(ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

40 CFR 63.829 Record keeping requirements:

(d) the owner or operator of each facility which commits to the criteria of 63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

SECTION V: INSIGNIFICANT ACTIVITIES

The following types of activities or emissions are deemed insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated May 25, 1999.

Description	Category
None	

SECTION VI: GENERAL CONDITIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
3. Pursuant to §19.704 of the Regulations of the Arkansas Plan of Implementation for Air Pollution Control (Regulation 19) and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the Department shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
4. Pursuant to §19.410(B) of Regulation 19 and/or §18.309(B) of the Arkansas Air Pollution Control Code (Regulation 18) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, construction or modification must commence within eighteen (18) months from the date of permit issuance.
5. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, records must be kept for five years which will enable the Department to determine compliance with the terms of this permit--such as hours of operation, throughput, upset conditions, and continuous monitoring data. The records may be used, at the discretion of the Department, to determine compliance with the conditions of the permit.

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

6. Pursuant to §19.705 of Regulation 19 and/or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any reports required by any condition contained in this permit shall be certified by a responsible official and submitted to the Department at the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

7. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, any equipment that is to be tested, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, shall be tested with the following time frames: (1) Equipment to be constructed or modified shall be tested within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source or (2) equipment already operating shall be tested according to the time frames set forth by the Department. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing.
8. Pursuant to §19.702 of Regulation 19 and/or §18.1002 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall provide:
- a. Sampling ports adequate for applicable test methods
 - b. Safe sampling platforms
 - c. Safe access to sampling platforms
 - d. Utilities for sampling and testing equipment
9. Pursuant to §19.303 of Regulation 19 and/or §18.1104 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

10. Pursuant to §19.601 of Regulation 19 and/or §18.1101 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if the permittee exceeds an emission limit established by this permit, they shall be deemed in violation of said permit and shall be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met:
 - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and that all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.
 - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
 - c. The permittee shall submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences, including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, it need not be submitted again.
11. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, the permittee shall allow representatives of the Department upon the presentation of credentials:
 - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit
 - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act
 - c. To inspect any monitoring equipment or monitoring method required in this permit
 - d. To sample any emission of pollutants
 - e. To perform an operation and maintenance inspection of the permitted source

International Paper Russellville Container
Permit #: 345-AR-2
CSN: 580047

12. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit is issued in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus.
13. Pursuant to §19.410(A) of Regulation 19 and/or §18.309(A) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be subject to revocation or modification when, in the judgment of the Department, such revocation or modification shall become necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.
14. Pursuant to §19.407(B) of Regulation 19 and/or §18.307(B) of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit may be transferred. An applicant for a transfer shall submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated §8-1-106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. A transfer may be denied on the basis of the information revealed in the disclosure statement or other investigation or, if there is deliberate falsification or omission of relevant information.
15. Pursuant to A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, this permit shall be available for inspection on the premises where the control apparatus is located.
16. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.
17. Pursuant to Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit supersedes and voids all previously issued air permits for this facility.

APPENDIX A

APPENDIX B

APPENDIX C

Route To: **FELICIA INMAN**
Administration

AIR DIVISION
INVOICE REQUEST FORM

(3-99)

Facility Name & Address:

International Paper Russellville Container
3900 International Paper Drive
Russellville, AR
72802

CSN: 580047

Permit No: 345-AR-2

Minor Source Permit Description: MS

Initial Fee Calculations:

Minor Source = 3 (\$18.08)(TPY predominant pollutant, except CO)

No less than \$500

Mod Fee Calculations:

Minor Source = 3 (\$18.08)(TPY increase predominant pollutant, except CO)
(18.47)(93.9) - 286 = 1448

No less than \$400

F = 1448

Fee Amount: \$ 1448

Engineer: Shane Byrum

Date: April 7, 2003

Public Notice

Pursuant to A.C.A. §8-4-203, and the regulations promulgated thereunder, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

International Paper Russellville Container (CSN: 580047) operates a corrugated container manufacturing facility located at 3900 International Paper Drive, Russellville, Arkansas 72801. IP Russellville originally operated under Air Permit 345-AR-1. In December 1997, IP Russellville submitted an Air Pollution Prevention Plan (APPP). Because Regulation 18 and 19 (effective February 15, 1999) were modified and no longer include provisions for APPPs, an air permit is necessary. Therefore, International Paper Russellville Container will now operate under Air Permit 345-AR-2 as a minor source under Arkansas Regulation 18 and 19.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Rhonda Sharp, Information Officer. Citizens desiring technical information concerning the application or permit should contact Shane Byrum, Engineer. Both Rhonda Sharp and Shane Byrum can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Pope County Library, 114 East Third Street, Russellville, Arkansas 72801. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Rhonda Sharp. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8).

Dated this

Randall Mathis
Director